U.S. Army
Corps of Engineers

New England District
Concord, Massachusetts

U.S. Environmental
Protection Agency

New England Region
Boston, Massachusetts

General Electric (GE)/Housatonic River Project
Pittsfield, Massachusetts

Contract No. DACW33-00-D-0006
Task Order 0002

FINAL

COMMUNITY RELATIONS PLAN

DCN: GE-072602-ABCY

July 2002

02P-1150-1

WESTON®

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GENERAL ELECTRIC (GE)/HOUSATONIC RIVER PROJECT
PITTSFIELD, MASSACHUSETTS

Contract No. DACW33-00-D-0006, Task Order No. 0002
DCN: GE-072602-ABCY

Prepared for

U.S. ARMY CORPS OF ENGINEERS

and

U.S. ENVIRONMENTAL PROTECTION AGENCY, NEW ENGLAND

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LIST OF ACRONYMS

ACO	Administrative Consent Order
ATSDR	Agency for Toxic Substances and Disease Registry
BCRPC	Berkshire County Regional Planning Commission
BNRC	Berkshire Natural Resources Council
CCC	Citizens Coordinating Council
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CTDEP	Connecticut Department of Environmental Protection
DEQE	Massachusetts Department of Environmental Quality Engineering
DNAPL	dense nonaqueous phase liquid
EE/CA	Engineering Evaluation/Cost Analysis
EPA	U.S. Environmental Protection Agency
EREs	Environmental Restrictions and Easements
GE	General Electric Company
GetREAL	Residents Environmental Action League
GIS	geographic information system
GMAs	Groundwater Management Areas
HEAL	Housatonic Environmental Action League
HRI	Housatonic River Initiative
HRR	Housatonic River Restoration, Inc.
HRWA	Housatonic River Watershed Association
HSWA	Hazardous and Solid Waste Amendments of 1984
HVA	Housatonic Valley Association
IRA	Immediate Response Action
LNAPL	light nonaqueous phase liquid
MDEP	Massachusetts Department of Environmental Protection
MCP	Massachusetts Contingency Plan
MDPH	Massachusetts Department of Public Health
MODR	Massachusetts Office of Dispute Resolution
MOU	Memorandum of Understanding
NAPL	nonaqueous phase liquid
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System

NPL	National Priorities List
NRD	Natural Resource Damage
OPCAs	On-Plant Consolidation Areas
PAHs	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyl
PCDD	polychlorinated dibenzodioxin
PCDF	polychlorinated dibenzofuran
PCE	tetrachloroethylene
PEDA	Pittsfield Economic Development Authority
ppb	parts per billion
ppm	parts per million
PRP	potentially responsible party
RAAs	Removal Action Areas
RAO	Response Action Outcome
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	remedial investigation/feasibility study
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
STM	Short Term Measure
SVOCs	semivolatile organic compounds
TAG	Technical Assistance Grant
TCE	trichloroethylene
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
U.S. DOI	U.S. Department of the Interior
U.S. DOJ	U.S. Department of Justice
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
VOCs	volatile organic compounds

1.
OVERVIEW OF THE COMMUNITY RELATIONS PLAN

1.1 BACKGROUND AND OBJECTIVES

The United States Environmental Protection Agency (EPA), New England Region, through coordination with the U.S. Army Corps of Engineers (USACE) and the Massachusetts Department of Environment Protection (MDEP), has prepared this Community Relations Plan. The Community Relations Plan describes the various programs to communicate the status of environmental activities concerning the General Electric Company (GE)/Housatonic River Project to the local communities and to obtain feedback from the citizens about issues and concerns.

The primary goal of the community relations activities is to inform and to promote two-way communication among regulatory agencies, neighborhood residents, environmentalists, elected officials, business people, and other citizens throughout the Housatonic River corridor from Pittsfield, MA, to Danbury, CT. In addition, the Community Relations Plan prepares the public for participating in the process of reviewing and making recommendations about the environmental studies and activities associated with the GE/Housatonic River Project (the study areas included in this project are described in Subsection 2.1).

Specific objectives of the Community Relations Plan are to:

1. Provide for the exchange of information regarding the environmental studies and activities concerning the GE/Housatonic River Project.

2. Solicit input, comments, and active involvement from the public, elected and civic leaders, and concerned agencies regarding the environmental program and to provide a means whereby citizens and agencies can interact and resolve issues of public interest and concern.

3. Provide a centralized point of contact for public agencies to express concerns and provide suggestions for developing an effective communications network about environmental matters concerning the GE/Housatonic River Project.

This Community Relations Plan outlines the public involvement objectives, presents specific policies and procedures governing public involvement activities related to environmental and remedial actions, assigns responsibilities for planning and implementing community relations program functions, and presents suggested communication activities and techniques to be used in meeting community relations

program goals. This Community Relations Plan was developed using EPA's *Community Relations in Superfund: A Handbook* (January 1992).

MDEP prepared the original *Public Involvement Plan* in 1990. MDEP provided the public an opportunity to comment on the draft plan and revised the plan accordingly. In April 1995, MDEP finalized a revised plan, *Revised Public Involvement Plan for the Housatonic River and the General Electric Company Pittsfield Disposal Sites*. The 1995 plan summarized the facility's history, remedial planning process, histories of the various sites, and public involvement activities.

This Community Relations Plan updates the information in the 1995 revised plan regarding the environmental studies and remediation and provides mechanisms for the distribution of information and avenues for soliciting, receiving, and responding to public comments and questions. This Community Relations Plan presents the issues and concerns voiced by local residents during community interviews conducted by EPA in July and August 1997. The Community Relations Plan presents information about GE/Housatonic River site environmental studies and community involvement activities through August 1, 2001.

1.2 ORGANIZATION OF THE COMMUNITY RELATIONS PLAN

The Community Relations Plan is organized in the following manner:

- The Table of Contents includes a list of acronyms as well as a listing of the other sections of the document.
- Section 1, Overview of the Community Relations Plan, provides a summary of the objectives and contents of the plan.
- Section 2, Site Background, presents the site history and background information about environmental activities at the GE facility and in the area of the Housatonic River.
- Section 3, Community Background, provides information about the local area, describes community involvement activities, and presents community issues and concerns.
- Section 4, Community Involvement Techniques, presents specific information about community relations activities.

The Community Relations Plan also includes the following attachments:

Attachment A Contacts, Interested Parties, and Media List

Attachment B Glossary

Attachment C	Locations of Information Repositories and Locations for Public Meetings
Attachment D	List of Selected Newspaper Articles
Attachment E	Technical Assistance Grant Information
Attachment F	EPA's Community Relations Components/Guidance
Attachment G	EPA Summary of Agreement: General Electric/Pittsfield-Housatonic River Site
Attachment H	Selected EPA, MDEP, and DPH Fact Sheets
Attachment I	Project Chronology

2.
SITE BACKGROUND

2.1 SITE LOCATION AND DESCRIPTION

The GE Plant Area, which includes both the GE facility and adjacent non-GE properties as defined in the Consent Decree (and shown in Figure 2-1), is comprised of approximately 360 acres. (Figures are presented at the end of this section.) The GE facility occupies 254 acres of the 360-acre Plant Area, and it is estimated that five million square feet of buildings occupy the GE facility.

The GE Plant Area is located along East Street and Merrill Road just east of downtown Pittsfield. Tyler Street and Dalton Avenue border the facility to the north and Merrill Road to the south and east. The CSX Corporation railroad tracks bisect the facility. Silver Lake borders the southwestern side of the facility. The East Branch of the Housatonic River borders the facility to the south and east, and Unkamet Brook, a tributary to the Housatonic River, flows through the eastern portion of the facility.

The facility property generally slopes toward the Housatonic River and Unkamet Brook. Groundwater in the vicinity of the site flows predominantly downslope toward the Housatonic River.

Land use surrounding the facility is a mixture of heavy and light industrial, commercial, and residential. Residents in the area surrounding the GE facility are served by the municipal water supply. Pittsfield's water sources are the Ashley and Sandwash Reservoirs in Washington, Massachusetts, and the Cleveland Reservoir in Hinsdale, Massachusetts.

The GE/Housatonic River Project Site includes the following areas:

- GE Plant Area.
- Former Oxbow Areas.
- Allendale School Property.
- Housatonic River Sediments and Riverbanks.
- Housatonic River Floodplain.
- Silver Lake.
- Groundwater.

- Other residential and commercial properties or areas that have become contaminated as a result of operations at the GE facility or the use of fill from the GE facility.

The hazardous substances associated with the site include polychlorinated biphenyls (PCBs), dioxins, furans, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and inorganic constituents (e.g., metals).

2.2 SITE HISTORY

In 1903, GE purchased the majority of the facility's property from Stanley Electric Company, the previous owner since 1890. During the 97 years of operation, this GE facility produced plastics and military-related equipment and manufactured transformers and other electrical components. In 1972, GE purchased acreage owned by the Berkshire Gas Company, which operated a former coal gasification plant from 1903 to 1953. Prior to 1972, releases of hazardous wastes from the coal gasification operations occurred on the property that is south of the railroad tracks and that is now owned by GE. GE continued to purchase adjacent properties either for expansion of facility operations or to obtain control of properties where soil or groundwater contamination, related to GE operations, had been detected.

Industrial processes throughout most of the GE plant occurred within three major divisions: Ordnance, Plastics, and Transformer. The Ordnance Division began operations in 1941 in support of the U.S. Armed Forces. Ordnance operations included developing submarine-launched ballistic-missile guidance systems, armored-vehicle transmissions, and shipboard fire-control systems. In April 1993, Martin Marietta purchased the GE Ordnance Division. The Plastics Division developed and piloted activities in engineering plastics, beginning with operations during World War II to manufacture boat molding and other plastic products for the war. This division continues to operate today. From 1903 to the 1977, the Transformer Division manufactured and serviced transformers and other electrical products. The ordnance operations at the site currently are being conducted for the U.S. Navy by General Dynamics Corporation.

2.3 SITE ENVIRONMENTAL HISTORY

2.3.1 Overview of Site History

GE used PCBs for over 40 years in the manufacture of transformers and associated products beginning in 1932 and ending in 1977. PCBs manufactured by Monsanto under the trade name of Aroclor were used by GE as an ingredient in Pyranol™, a high-grade synthetic, fire-resistant

transformer fluid. Pyranol™ was used to insulate about 3% of the transformers manufactured by the GE Pittsfield facility. Pyranol™ contained approximately 45 to 60% PCBs. The bulk (97%) of the transformers were filled with a mineral oil dielectric fluid, which was petroleum based.

From the late 1930s to the 1970s, hundreds of thousands of gallons of transformer oil contaminated with PCBs were released to soil, groundwater, and surface water in the area of the Transformer Division Plant. Large quantities of PCBs from industrial process water, stormwater, and groundwater discharges reached the Housatonic River. Following accepted practices of the time period, PCBs were used and disposed of within and around the facility in landfills, the former oxbows, and other locations. GE commonly provided fill material from the plant area for a variety of projects from the 1940s to the 1970s, including the filling of the former oxbows and local residential and commercial properties. Subsequently, PCBs were discovered in the fill materials provided by GE.

Coal tar oils and solid waste from the former Berkshire Gas facility containing polycyclic aromatic hydrocarbons (PAHs) were found at East Street Area II site and within and along the banks of former Oxbow H.

The extensive nature of the GE transformer oil leaks was first discovered in 1952 at the East Street Area 1 site, where transformer oil was detected in the basement of a residential property on East Street. In response to this discovery, GE began conducting environmental investigations and oil collection operations in the mid-1950s at the East Street Area 1 site (Figure 2-1).

Additional investigations and corrective actions targeted at transformer oil leaks were implemented starting in the early 1960s at a second site, East Street Area 2 (Figure 2-1). GE has conducted a continuing series of environmental investigations and remedial actions at both East Street Area sites up until the present time. Many of these investigations and remedial actions were related to EPA and MDEP regulatory requirements, which were initiated in the early 1980s.

2.3.2 PCB Contamination Information

PCBs are a family of chlorinated organic compounds that possess the following properties: thermal (heat) stability, resistance to chemicals (acids and bases), and excellent electrical insulation characteristics. PCBs do not readily mix with water. Currently, more than 200 individual PCB compounds (congeners) are known. Commercially, PCBs were available as mixtures of various individual compounds (e.g., Aroclor 1260).

Monsanto Corp. was the U.S. manufacturer of these PCB mixtures, which were sold under the trade name of Aroclor.

PCB mixtures have been used in the manufacturing of lubricants, carbonless paper, adhesives, specialized paints, and caulking compounds. Since PCBs are chemically stable, nonflammable, nonexplosive, and possess electrical insulation characteristics, they were widely used in transformers and capacitors, hydraulic and heat transfer equipment, compressors and vacuum pumps, and as plasticizers (surface coatings and sealants). Although the domestic manufacture of PCB mixtures was stopped in 1977, existing electrical components containing PCBs continue in use, and as a result, PCBs can still enter the environment through improper disposal practices.

PCBs are stable in the environment (i.e., they are only slowly degraded). When PCBs enter the environment, they may migrate and degrade at different rates. PCBs with low chlorine content tend to be more volatile, escaping to the atmosphere and degrading more readily. Those with higher chlorine content tend to adhere to soil and sediment particles and are more resistant to degradation.

Humans may be exposed to PCBs in the environment through ingestion (soil, food), inhalation (air), and dermal contact (skin absorption from touching PCB-contaminated material). Because PCBs are highly persistent in the environment, and very fat soluble, they tend to concentrate in the fat of animals and humans once they are absorbed. In addition, they are not readily degraded once in the body. As a result, PCB contamination in sediments magnifies as it passes up through the food chain. PCB-contaminated insects and small aquatic animals are eaten by fish, which are ingested by birds and larger animals, and they in turn may be consumed by humans; therefore, PCB concentrations progressively increase in the tissues of animals higher up in the food chain. When tested, most humans show traces of PCBs in their blood and fatty tissues as a result of their exposure through consumption of game fish, game animals, or animal products contaminated through the food chain. PCBs may also be passed through breast milk to nursing infants. EPA considers PCBs to be probable carcinogens.

In October 1976, Congress passed the Toxic Substances Control Act (TSCA) and specifically directed EPA to regulate PCBs. This was the only chemical substance specifically named in TSCA because Congress believed that its chemical and toxicological properties and its widespread use posed significant risks to public health and the environment.

EPA issued regulations for the proper disposal of PCBs and their manufacture, distribution, and use in other than a totally enclosed manner. On February 17, 1978, EPA announced the PCBs Marking and Disposal Rule, establishing specific requirements for the identification

and disposal of PCBs according to the nature and concentration of the PCBs in question. On May 31, 1979, EPA issued regulations prohibiting and restricting continued use of PCBs.

2.3.3 Study Area Designations

During the course of environmental studies at the GE/Housatonic River Site, various study area designations have been used. The original study area designations were replaced by a new set of study area designations in the 1999 Consent Decree; however, the former designations are necessary when researching the history of the site. Table 2-1 summarizes the study area designations, and the locations of the study areas are shown on Figure 2-2.

Table 2-1

Former Site Study Area Designations

Operable Unit Designation	MDEP Designation	EPA New England Resource Conservation and Recovery Act (RCRA) Designation
OU 1	Unkamet Brook Area	EPA Area 1
	Hill 78 Area	EPA Area 2
	East Street Area I	EPA Area 3
	East Street Area II (Building 68 and Former Oxbow H)	EPA Area 4
	Lyman Street Parking Lot (Former Oxbows D and E)	EPA Area 5A
OU 2	Housatonic River	EPA Area 6
OU 3	Allendale School	Out of EPA New England RCRA jurisdiction
OU 4	Silver Lake	EPA Area 6
OU 5	Newell Street Parking Lot (Former Oxbows F and G)	EPA Area 5B
	Newell Street Area I (Former Oxbow I)	Out of EPA New England RCRA jurisdiction
OU 6	Former Oxbows A, B, C, J, K	Out of EPA New England RCRA jurisdiction

On October 7, 1999, a Consent Decree was signed between GE and representatives of EPA, MDEP, and other government agencies and groups. On October 27, 2000, the court entered the Consent Decree. The Consent Decree lists the following specific areas for cleanup:

- GE Plant Area:
  - 40s Building Complex.
  - 30s Building Complex.
  - 20s Building Complex.

  - East Street Area 2 South.
  - East Street Area 2 North.
  - East Street Area 1 North.
  - Hill 78 On-Plant Consolidation Area.
  - Building 71 On-Plant Consolidation Area.
  - Hill 78 Area - Remainder.
  - Unkamet Brook Area.

- Former Oxbow Areas:

  - Former Oxbow Areas A and C.
  - Lyman Street Area.
  - Newell Street Area I.
  - Newell Street Area II.
  - Former Oxbows J and K.

- Allendale School.

- Housatonic River Floodplain:

  - Residential and nonresidential floodplain properties adjacent to 1½-Mile Reach.

  - Residential floodplain properties downstream of 2-Mile Reach (confluence) of Housatonic River with actual/potential lawn areas.

- Silver Lake.

- Groundwater Management Areas (GMAs) 1 to 5.

- Housatonic River:

  - Housatonic River sediments and riverbanks -Upper ½-Mile Reach from Newell Street to Lyman Street.

  - Housatonic River sediments and riverbanks -Next 1 ½-Mile Reach from the Lyman Street Bridge to the Confluence of the East and West Branches.

  - Housatonic River sediments and riverbanks - Downstream from the Confluence of the East and West Branches.

Figure 2-1 shows the GE Plant Area sites, the former oxbow areas, Allendale School, and Silver Lake. Figure 2-3 presents a map of the Housatonic River, and Figure 2-4 shows the Housatonic River floodplain properties under investigation.

Brief overviews of each current study area for the GE/Housatonic River Site are presented in the following subsections.

2.3.4 Environmental Overview of Current Study Areas

2.3.4.1 GE Plant Area

As described in the Consent Decree, the GE Plant Area has been divided into 10 Removal Action Areas (RAAs) based on geographic location, regulatory status, similar land use, and several other considerations (Figure 2-1). These RAAs are designated for soil-related remedial actions. Groundwater and oil related actions will be handled separately under more extensive Groundwater Management Areas (GMAs).

40s Building Complex

This area, which is approximately 9 acres, is located within the western portion of GE's Pittsfield facility and is bounded by Kellogg Street to the north, the CSX railroad lines to the south, other portions of the GE facility to the east, and non-GE owned commercial/industrial areas to the west. Currently, Buildings 42, 43, 43-A, and 44 constitute nearly one-half of this area (eastern portion), whereas the remainder is mostly paved (asphalt/concrete). Previously, Buildings 40-B, 41, and 41-A constituted much of the western portion of this area; these buildings were demolished in the early 1990s, although the subgrade portions of these buildings remain within this area. This area of the facility is a component of the redevelopment agreement between GE and the City of Pittsfield. All of the existing buildings are scheduled for demolition.

Various industrial operations were housed in the 40s Building Complex, including machine shops, laboratories, paint shops, vapor degreasing operations, and acid and alkali metals treatments. Process water from these operations and stormwater from the 40s Complex discharged into Silver Lake.

30s Building Complex

This approximately 20-acre area is located south of the 40s Complex, and is generally bounded by Silver Lake Boulevard to the west, East Street to the south, and other areas of the GE facility to the south and east. This area includes asphalt/concrete areas, some unpaved areas, and several existing buildings. This area of the facility is a component of the redevelopment agreement between GE and the City of Pittsfield. Most of the existing buildings are scheduled for demolition.

A power and steam generation plant, aboveground oil storage tanks, and various industrial operations were located in the 30s Building Complex, including paint shops, vapor and cold solvent degreasing operations, a mercury boiler, and metal pretreatment operations. Historically, process water from these operations and stormwater from the 30s Complex discharged into Silver Lake.

20s Building Complex

This area, which is approximately 15 acres, is located immediately east of the 30s Complex within the western portion of the GE facility, and is bounded by East Street to the south and other areas of the GE facility to the north and east. The existing asphalt parking areas predominantly characterize current conditions within this area. Previously, these areas were associated with most of the 20s Complex buildings that were razed in the late 1980s. At this time, two buildings remain in this area. This area of the facility is a component of the redevelopment agreement between GE and the City of Pittsfield. All of the existing buildings are scheduled for demolition.

Formerly, GE Transformer Division operations were conducted in the 20s Building Complex, which included the Southside Tank Farm where transformer oils were stored. Berkshire Gas also conducted coal gasification operations in the eastern portion of the 20s Complex. Other GE operations historically located in the 20s Complex include paint spraying, vapor degreasing, and metals treatments using acids and phosphatizing solutions.

The largest transformer oil plume at the GE facility extends underneath the 20s Complex from its origin north of the railroad tracks in the central portion of the East Street Area 2-North RAA (see Figure 2-1). This plume consists primarily of 10C mineral (petroleum-based) oil, but it also contains lesser amounts of PCB transformer oil. Both the 10C and PCB oils were used as a dielectric fluid in transformers.

East Street Area 2 - South

This area is approximately 50 acres of the western portion of the GE facility. It is generally bounded by East Street to the north, Newell Street to the east, the Housatonic River to the south, and the Lyman Street Area to the west. The western portion of this area is occupied by the 60s Building Complex and former Scrapyard, and is otherwise primarily paved areas. The eastern portion of this area contains a former Housatonic River oxbow (Oxbow H) that was formed when the river meandered through this area. Oxbow H was cut off from the river during the 1940s when the U.S. Army Corps of Engineers (USACE) rechannelized the river in the Pittsfield area. This area is currently

characterized as mostly open areas, with a relatively small wooded area located within the extent of the former oxbow.

The East Street Area 2 transformer oil plume formerly extended across the entire site from north to south, reaching the East Branch of the Housatonic River where, in the past, oil was detected seeping out of the riverbanks and into the river. During the last 30 years, GE has implemented a variety of environmental investigations and remedial actions in this area to help characterize, control, and remediate this oil plume. GE has used the following facilities and containment barriers at the site: (1) groundwater and wastewater treatment plants; (2) a thermal oxidizer unit; (3) oil containment booms along the riverbank oil seeps; (4) oil/groundwater extraction wells and caissons; (5) underground slurry and sheetpile containment walls; (6) and oil/water separators. GE used the thermal oxidizer unit from 1972 through 1996 to burn waste transformer oils.

In addition to the transformer oil plume, there are several other areas at the site with outstanding environmental issues, including the Scrapyard Area, Oxbow H fill area, and the Building 68 PCB tank collapse. Various oils, solvents, and other chemicals were reported to have been released to the ground in the Scrapyard Area during the routine handling and crushing of drums, transformers, and other spent equipment from GE's operations. Waste products from the Berkshire Gas coal gasification plant were disposed of in and along the banks of the eastern and central portions of Oxbow H. These wastes included coal tar and spent oxides associated with cyanides and various metals. In 1968 a PCB storage tank collapsed at Building 68, releasing approximately 1,000 gallons of PCB transformer oil onto the riverbank and into the Housatonic River itself.

East Street Area 2 - North

This area, which is approximately 50 acres, is also located within the western portion of the GE facility. This area includes primarily buildings and pavement; however, several relatively small grassy areas are present within the eastern portion. This area is generally bounded by Tyler Street to the north; New York Avenue to the east; Woodlawn Avenue and the 40s Complex to the west; and Merrill Road, the 20s Complex, and East Street Area 1 to the south.

The East Street Area 2-North Site housed the bulk of the former GE Transformer Division facilities, and it contains the source of the major transformer oil plume that extends southward to the Housatonic River. GE states that transformer oil leaks and spills from the oil storage tanks and distribution facilities (leaking pipes) in East Street Area 2-North were the source of the oil plume.

East Street Area 1 - North

This area, which is approximately 5 acres, is located immediately south of East Street Area 2 - North and east of the 20s Complex. This area is mostly unpaved, and is generally bounded by Merrill Road to the north and west, East Street to the south, and a non-GE owned commercial area to the east. This area also includes a commercial-use building (of which GE owns a portion), and a relatively small, unpaved GE-owned property south of East Street, which contains a NAPL containment/recovery system.

Transformer oil leaks from GE's 12F Tank Farm, formerly located just north of the railroad tracks in East Street Area 2-North, migrated underground as an oil layer floating on groundwater into the residential area north of East Street where it was initially detected in the 1950s. The oil was identified as 10C mineral oil contaminated with PCBs. GE has conducted multiple environmental investigations and oil recovery operations at the site since the 1950s. Currently, GE operates two oil recovery systems along East Street near the intersection with Newell Street.

On-Plant Consolidation Areas

The Consent Decree states that "materials that are excavated or otherwise removed from their current location at the site and demolition debris from building demolition may be permanently consolidated at the GE Plant Area using a combination of the Hill 78 Consolidation Area, the Building 71 Consolidation Area, and another potential Consolidation Area at the corner of New York Avenue and Merrill Road."

Hill 78 On-Plant Consolidation Area

This area, which is approximately 6 acres, currently rises about 15 feet above grade and is located near the center of the GE facility. This area includes the former Hill 78 Landfill, which was originally created in the early 1940s as an on-site disposal area for excavated soils generated within the GE facility. The landfill was capped in 1991 with a geotextile layer and 1 foot of either crushed stone or soil. This area is being used as an on-plant consolidation area (OPCA) for certain materials excavated during the ½-mile reach removal action and will be used for disposal of some materials to be excavated during the 1 ½-mile reach removal action. These consolidation materials will be classified as non-TSCA (i.e., containing less than 50 parts per million [ppm] of PCBs). Once filled, the area will be covered using a multi-layered engineering cap.

GE began using the 3.5-acre Hill 78 Landfill in the early 1940s for the disposal of excavated soils, plant demolition and construction debris, and other solid wastes. Drums containing PCB-contaminated soil were

allegedly disposed of in the landfill during the 1950s and 1960s. From the 1970s to 1990, materials placed in the landfill included soils and construction debris containing PCBs at concentrations less than 50 ppm. This practice was discontinued in 1990 at MDEP's request, and an MDEP-approved cover was placed over the landfill as a short-term remedial measure.

Building 71 On-Plant Consolidation Area

This approximately 5-acre area within the central portion of the GE facility is located immediately to the east of the Hill 78 On-Plant Consolidation Area. This area is unpaved and is bounded by paved parking areas to the north and east, by the Hill 78 On-Plant Consolidation Area to the west, and PG&E Generating Company facilities to the south. This area is being used as an on-plant consolidation area for certain materials excavated during the ½-mile reach removal action and will be used for disposal of some materials to be excavated during the 1 ½-mile reach removal action. The design of the Building 71 OPCA includes a base liner system and berms to contain and collect rainwater and snowmelt. TSCA-regulated materials (i.e., containing greater than 50 ppm of PCBs) are placed at the Building 71 OPCA. Once filled, the area will be covered using a multi-layered engineering cap.

Hill 78 Area - Remainder

The remaining portion of the Hill 78 Area consists of approximately 60 acres of the GE facility. These areas are bounded by the Tyler Street Extension to the north, Merrill Road to the south, New York Avenue and other areas of the GE facility to the west, and other areas of the GE facility to the east. With the exception of paved roadways associated with Building 78, the PG&E Generating Company's cogeneration facility, the remaining areas of the Hill 78 Area are generally open. A small portion of this area (on the southeastern corner of the site near the intersection of New York Avenue and Merrill Road) has also been selected for possible future use as an on-plant consolidation area.

Unkamet Brook Area

This area, which is approximately 140 acres, consists of the eastern portion of the GE facility and is bounded by Dalton Avenue to the north, Plastics Avenue and the Hill 78 Area - Remainder to the west, Merrill Road to the south, and to the east by railroad tracks. This area also contains commercial/recreational property located between Merrill Road and the Housatonic River to the south.

The GE-owned portion of this area located west of Unkamet Brook is mostly paved and is occupied by large buildings. The GE-owned portion of this area east of Unkamet Brook, as well as much of the land between

Merrill Road and the Housatonic River, is undeveloped (except for the area associated with Building OP-3 and the commercial area along Merrill Road).

GE operated the Interior Landfill, covering approximately 14 acres, until the late 1970s. An asphalt-paved parking lot covers the western portion of the landfill. The eastern portion is uncovered and lies within the Unkamet Brook wetlands area. Unkamet Brook bisects the landfill and flows directly to the Housatonic River. The landfill lies within the Unkamet Brook 10-year floodplain.

Soil, excavated as part of the construction of GE Buildings OP-1 and OP-2 in 1940 and 1941, was disposed of in the landfill along with wastes related to bushing operations conducted in GE Buildings 51 and 59. Excavations performed during the rerouting of Unkamet Brook in the late 1970s indicated the presence of capacitors that had been disposed of in the Interior Landfill. An Immediate Response Action under the Massachusetts Contingency Plan was conducted in June 1998 because of the presence of drums, capacitors, bushings, and insulators at the landfill surface along Unkamet Brook. The drums and electrical equipment observed along Unkamet Brook were removed and disposed of off-site.

A Former Waste Stabilization Basin is located west of Unkamet Brook, south of the western portion of the Interior Landfill, and north of Merrill Road on the GE facility. For more than 40 years, wastewater and stormwater were discharged into the basin and then into Unkamet Brook. In December 1979, in accordance with an agreement between GE and MDEP, the discharge of wastewater to the waste stabilization basin was discontinued. From 1979 to 1980, GE conducted an investigation to characterize the sediments within the Former Waste Stabilization Basin. The presence of VOCs, SVOCs, PCBs, and inorganic constituents was identified. In 1981, standing liquids and the sludge within the basin were removed and disposed of in a secure, permitted landfill. Following the removal of these materials, the basin was backfilled with gravel, capped with soil, and seeded.

Although the Waste Stabilization Basin has been remediated by GE, a large VOC groundwater contaminant plume associated with the former site was identified extending from the former waste basin to the Housatonic River.

Groundwater

Groundwater and oil releases associated with the aforementioned areas will require investigation and monitoring, and possibly containment, treatment, and product recovery. The oils detected at the GE/Housatonic River Site are classified as either light non-aqueous phase liquids (LNAPLs) or dense non-aqueous phase liquids (DNAPLs). The LNAPLs

are lighter than water and generally tend to accumulate at the top of the groundwater table. The DNAPLs are denser than water and tend to migrate downward through the groundwater table and accumulate at the top of the low permeability soil or rock layers.

The primary concern is to prevent contaminated groundwater and NAPLs from adversely affecting surface water, e.g., Unkamet Brook, the Housatonic River, and Silver Lake. The groundwater and NAPLs will also be evaluated to ensure that any vapors emitting from contaminated groundwater and oil releases do not pose a risk to the occupants of buildings.

2.3.4.2 Housatonic River Study Area

The Housatonic River study area includes river sediments, riverbank materials, and floodplain soils of the Housatonic River that are contaminated with hazardous substances, especially PCBs. Numerous studies conducted since 1982 have included river sediment, fish tissue, and benthic organism samples collected from the Housatonic River. Based on the nature and extent of contamination, the study area currently extends from approximately Unkamet Brook to the mouth of the Housatonic River at Long Island Sound (see Figure 2-3). PCB contamination has been detected for many miles below the confluence, and further EPA studies are underway. The most PCB-contaminated area is a 12-mile segment that begins at the confluence of the Housatonic River with the Unkamet Brook in Pittsfield and ends at Woods Pond in Lenox, Massachusetts.

The Housatonic River is used for recreation, including fishing, boating, and swimming. The Housatonic River has been closed to fishing for human consumption since 1982 due to PCB contamination.

The Housatonic River cleanup is divided into three segments or reaches, the first ½ mile adjacent to the facility, the next 1 ½ miles downstream to the Confluence of the East and West Branches, and the Rest of River downstream of the confluence.

Upper ½-Mile Reach

The first ½ mile reach of the Housatonic River subject to remediation is located in a densely populated area near the center of Pittsfield between the Newell Street and Lyman Street Bridges. The area is primarily commercial/industrial, although there is one recreational property abutting the Housatonic River. A portion of GE's property abuts the river to the north, and several commercial/industrial properties, a playground, and additional GE property abut the river to the south. The entire ½-mile section of the river was channelized by the city and USACE in the 1940s.

As a result, there are relatively steep banks and minimal floodplain in this area. Five former oxbows are present in this stretch of the river. Many of the historical contaminant discharges to the Housatonic River were likely to have occurred within this ½-mile. The Building 68 PCB tank release referenced above occurred at the approximate mid-point of the first ½ mile reach.

Remediation in the first ½ mile consists of two separate cleanup phases conducted by GE under EPA requirements. In 1997 and 1998, GE excavated and disposed of 5,000 cubic yards of heavily contaminated sediments from a 550-foot section of the river and 2,230 cubic yards of heavily contaminated bank soils from a 170-foot stretch of the riverbank associated with the Building 68 tank spill.

The second phase of the cleanup consists of riverbank soil and sediment excavation throughout the first ½ mile. GE initiated cleanup activities in October 1999, and the ½ mile cleanup is scheduled to be completed in summer 2002.

1 ½-Mile Reach

The next 1 ½ miles of the river below the Upper ½-Mile Reach are located in an area with residential, commercial, industrial, and undeveloped/recreational properties. There are approximately 40 residential properties located within or adjacent to the floodplain. Approximately 1,500 feet of this reach was channelized by the city and USACE in the 1940s, and three former oxbows are within this stretch of the river. In the first mile, the riverbanks are generally steep and the floodplain narrow. In the final ½ mile, the riverbanks are relatively low, resulting in a broad floodplain. The 1 ½-Mile Reach begins at the Lyman Street Bridge and ends at the Confluence of the East and West Branches of the Housatonic River.

Contamination from the GE facility has migrated downstream from the Upper ½-Mile Reach and has impacted the riverbank soils and river sediments in this reach. In addition, coal tar contamination related to the former Pittsfield Coal Gas Company (now Berkshire Gas) Works has been detected in the 1 ½-Mile Reach sediment and riverbank soils. EPA will perform the cleanup of the sediments and riverbanks in this 1 ½-Mile Reach under the Consent Decree. GE and EPA will share the costs of this cleanup under a formula presented in the Consent Decree.

Rest of River Investigation

EPA is conducting an investigation of the Rest of River below the 1 ½-Mile Reach into Connecticut, which is focused on collecting information for and preparing the human health and ecological risk assessments and modeling PCB fate and transport in the river. Following the

investigations and peer review, GE will prepare a Supplemental Resource Conservation and Recovery Act (RCRA) Facility Investigation Report, propose cleanup levels, and analyze cleanup alternatives (corrective measures). After consultation with MDEP and receipt of public comments, EPA will select corrective measure(s) for the Rest of River. The Rest of River response action, if necessary, is estimated to begin in 2006-2007.

Numerous studies have been conducted since 1988 that document PCB contamination of biota (fish, birds, etc.), sediments, and floodplain soils adjacent to the Housatonic River downstream of the plant, and investigations are still ongoing.

2.3.4.3 Allendale School Soils

Allendale School is located to the north of the Hill 78 Landfill, across the Tyler Street Extension. The school was constructed in 1950 on a 12-acre parcel. When the Allendale School was being constructed, GE and the City of Pittsfield entered into an agreement under which GE permitted the City of Pittsfield to remove approximately 40,000 cubic yards of soil from the GE property for use as fill in the schoolyard. The area from which the soil was removed is now known as the Hill 78 Landfill Area.

MDEP initially identified concerns associated with the Allendale Schoolyard when PCBs were detected during construction of the Altresco Corporation Cogeneration Facility (now owned by the PG&E Generating Company). The Altresco facility was constructed next to the Hill 78 Landfill. At the time of construction, environmental samples were collected and contamination was identified. It was at this point that the connection was made that the soil used as fill at the school might also be contaminated. Results from soil/water sampling events from 1990 to 1996 indicated the presence of various hazardous substances, including VOCs, SVOCs, herbicides, PCBs, furans, and inorganic constituents.

In 1991, a geotextile layer and "clean" soil cover was constructed on a portion of the Allendale School property to isolate the contamination. The cover (or cap) was approximately 5 acres and was applied to the areas where the concentration of PCBs found in soil samples exceeded 2 ppm.

At the request of MDEP, GE initiated field activities to delineate areas outside of the existing cap that had PCB soil contamination greater than 2 ppm. As a result of those field activities, GE performed a limited removal of 1,600 cubic yards of impacted soil from the Allendale School property during April 1998.

In July 1999, GE commenced a soil removal action for the Allendale School Property pursuant to an Action Memorandum issued by EPA on

July 12, 1999. The action involved the removal of all PCB-contaminated soil above 2 ppm from the Allendale School property. The temporary cap and the underlying PCB-contaminated soils were excavated and removed during the action. The work was completed in the fall of 1999.

Once backfilling was complete, the schoolyard was restored. Restoration included placing topsoil and grass sod, installing soccer and baseball fields, constructing a walking track, and installing a paracourse system. Restoration also included planting new shrubs and trees.

On January 20, 2000, a pre-certification inspection was conducted by representatives of GE, EPA, and MDEP. On February 18, 2000, GE submitted a Final Completion Report for the Allendale School Removal Action.

2.3.4.4 Silver Lake

Silver Lake, which is located on the GE facility property, is a 26-acre body of water reaching a maximum depth of about 30 feet. The lake is bounded by the GE facility to the east and northeast, commercial properties to the north, and a mixture of commercial and residential properties to the south and west. Several of the residential properties surrounding Silver Lake have received fill from GE in the past and are subject to the Residential Fill Property Program.

Currently, stormwater from both the City of Pittsfield and GE is discharged to the lake through both municipal and GE outfalls. Local groundwater also discharges into Silver Lake. Once in the lake, excess water flows into the Housatonic River via an overflow embankment and a concrete conduit that passes under East Street.

Silver Lake has been the subject of numerous investigations performed by GE since the mid-1970s. Studies have been conducted on the lake under a Consent Order issued to GE by MDEP in May 1990. The main contamination found in the Silver Lake sediment is PCBs. Overall, the sediments in the lake are heavily contaminated and show evidence of "silting over," meaning the highest concentrations of PCBs are found below the top 6 inches of sediment. The lake sediments have been analyzed for other hazardous substances, and analyses revealed the presence of organic compounds (mainly acetone, methylene chloride, PAHs, dioxins/furans, and phenols) and metals (aluminum, calcium, chromium, iron, lead, and zinc).

There are several possible sources of contamination to Silver Lake. The most probable source of the PCBs detected in Silver Lake is the historic discharge of process water and stormwater from the GE Facility. GE currently operates four National Pollutant Discharge Elimination System

(NPDES) permitted outfalls into Silver Lake. These four GE outfalls discharged process and stormwater associated with areas of the GE Facility where PCBs were historically handled.

Other industries and commercial properties are or have been located around Silver Lake, which may have contributed to the contamination detected in the lake. Until the mid-1970s, Pittsfield's sanitary sewers discharged into the lake. Two power plants used the lake to withdraw and discharge non-contact cooling water. In addition, inadvertent releases of chemicals at GE or other industrial/commercial properties may have entered the storm sewers or sanitary sewers, which discharged to Silver Lake.

Under the Consent Decree, GE is required to conduct remediation for Silver Lake including limited sediment removal, installing a cap over the entire lake bottom, and bank soil removals.

Following sediment removal and capping, GE will conduct natural resource restoration and habitat enhancement activities at Silver Lake.

2.3.4.5 Former Oxbow Areas

During the 1940s, efforts to alleviate potential flooding problems by straightening the Pittsfield segment of the Housatonic River by the City of Pittsfield and USACE resulted in 11 former oxbows being isolated from the river channel. These oxbow channels were subsequently filled with soil and other materials that were later discovered to contain PCBs and other hazardous substances.

As described in the Consent Decree, the Former Oxbow Areas have been divided into five Removal Action Areas (RAAs) (Figure 2-1). These RAAs are designated for soil-related remedial actions. Groundwater and oil-related actions will be handled separately under several Groundwater Management Areas (GMAs).

Former Oxbow Areas A and C

Former Oxbow Area A is approximately 5 acres and occupies a large open field on the southern side of the Housatonic River north of Elm Street and Newell Street. The majority of this area is undeveloped and covered with grass and low brush, although commercial businesses occupy a portion of the parcels containing the former oxbows. Former Oxbow Area C is approximately 2 acres and located immediately east of Former Oxbow Area A, along the southern side of the Housatonic River, near the end of Day Street. A drainage ditch leading to the Housatonic River bisects Oxbow C. This area consists mostly of an undeveloped field surrounded by trees and brush.

Various portions of former Oxbows A and C were progressively filled with soil and other materials from the 1940s to the 1980s. In response to MDEP requirements, GE began conducting preliminary investigations at these fill areas in 1988. PCBs were the primary contaminant detected during these investigations; however, VOCs, SVOCs, pesticides, herbicides, dioxins, furans, and metals were also detected at one or both of the oxbow areas. In 1997, GE conducted an Immediate Response Action (IRA) soil removal under the Massachusetts Contingency Plan at the northeast corner of Oxbow C to address surficial PCB soil contamination. The excavated area was backfilled with clean soil and replanted with grass and thorny shrubs to limit access to the wooded areas where some contaminated soils remained. Only limited environmental data are available for former Oxbows A and C, and more investigations are scheduled under the requirements of the Consent Decree.

Lyman Street Area

This area, which is approximately 9 acres, is located immediately west of the East Street Area 2 - South and is bounded by the Housatonic River to the south, East Street and several commercial/residential properties to the north, and Cove Street to the west. Approximately 3 acres of this area consists of the GE-owned Lyman Street Parking Lot, which is paved. Former Oxbow D underlies the parking lot area. The remaining GE-owned portions of this area are partially paved and undeveloped. The non-GE-owned portions of this area consist of an undeveloped right-of-way for high-tension electricity transmission lines (containing Former Oxbow Area E) and Former Oxbow Area B. Former Oxbow Area B is approximately 3 acres and located north of and across the Housatonic River from Former Oxbow Area C, west of Lyman Street, and immediately east of Cove Street. Nearly all of this former oxbow area is used for parking in support of local commercial businesses, although a building occupies a small portion of this area. The remaining portions are undeveloped.

Oxbows B, D, and E were filled with soil and other materials during the 1940s. Various GE environmental investigations, starting in 1986, have determined that the fill is primarily contaminated with PCBs; however, VOCs, SVOCs, pesticides, herbicides, dioxins, and furans were also detected. During a 1990 site reconnaissance, oil seeps were observed, which were later found to contain PCBs. Further investigations detected plumes of both light and dense non-aqueous phase liquids (LNAPL and DNAPL) related to the dumping of transformer oils at the site.

During the last 15 years, GE has implemented a variety of environmental investigations and remedial actions in this area to help characterize, control, and remediate these oil plumes. GE has used or plans to use the following facilities and containment barriers at the site: oil booms along

the riverbank oil seeps, oil/groundwater extraction wells, and an underground sheetpile containment wall.

Newell Street Area I

This area, which is approximately 11 acres, includes 10 commercial/ industrial properties and 3 recreational properties located along Newell Street. All but one of these properties include portions of former Oxbow I, which was filled with soil and other materials beginning in the 1940s. Newell Street Area I is bounded by the Housatonic River to the north, Newell Street to the south, the Lakewood (formerly Hibbard School) playground to the east (including the northwest corner of that playground within this area), and the Ontario Street Extension and the GE-owned Newell Street Parking Lot to the west.

MDEP received notice in 1983 that GE had allegedly disposed of waste transformer oils at the Newell Street sites. In 1987, GE initiated limited environmental investigations at the site that have confirmed the presence of PCBs; however, no transformer oil plumes have been discovered at Newell Street Area I. Other contaminants detected at the site include dioxins, furans, and metals.

GE has completed three IRAs and Short-Term Measures (STMs), performed under the Massachusetts Contingency Plan, at the site involving the removal of limited amounts of PCB-contaminated surface soil, fencing off some contaminated areas, and paving over other contaminated areas.

More investigations have been conducted, and a final cleanup is required under the provisions of the Consent Decree.

Newell Street Area II

This area, which is approximately 8 acres, is located immediately west of Newell Street Area I and is bounded by the Housatonic River to the north, Newell Street and residential property to the south, and Sackett Street to the west. Approximately 3 acres of this area is composed of the GE-owned Newell Street Parking Lot, which is paved. Former Oxbow Area G is located under the parking lot. The remaining GE-owned portions of this area are wooded. The non-GE-owned portions of this area consist of an undeveloped right-of-way for high-tension electricity transmission lines, and undeveloped private property. Former Oxbow Area F is located within this right-of-way.

MDEP received notice in 1983 that GE had allegedly disposed of waste transformer oils at the Newell Street sites. In 1987, GE initiated limited environmental investigations at the Newell Street Area II site that have confirmed the presence of PCBs and both LNAPL and DNAPL

transformer oil plumes. Other contaminants detected at the site include VOCs, SVOCs, pesticides, dioxins, furans, and metals.

Since 1998, GE has conducted both manual and automated oil (LNAPL and DNAPL) recovery system operations at the Newell Street Area II site.

More investigations will be conducted, and a final cleanup is required under the provisions of the Consent Decree.

Former Oxbow Areas J and K

These areas are located approximately 2,500 feet upstream of the Newell Street Bridge. Former Oxbow Area J occupies approximately 4 acres and is located on the northern side of the Housatonic River near Fasce Place. A drainage ditch, originating at a City of Pittsfield stormwater outfall and leading to the Housatonic River, bisects Oxbow J. Former Oxbow Area K occupies approximately 1 acre and is located on the southern side of the Housatonic River across from Former Oxbow Area J near Ventura Avenue. The outlet channel from Goodrich Pond crosses Oxbow K and empties into the Housatonic River. While Former Oxbow Area K is undeveloped, Former Oxbow Area J is composed of residential property to the west and commercial property to the north along East Street.

Beginning in the 1940s and ending in the 1980s, various portions of former Oxbows J and K have been progressively filled with soil and other materials. In response to MDEP requirements, GE began conducting preliminary investigations at these fill areas in 1988. PCBs were the primary contaminants detected during these investigations; however, SVOCs, pesticides, dioxins, and furans were also detected at one or both of the oxbow areas. Only limited environmental data are available for former Oxbows J and K, and more investigations are scheduled under the requirements of the Consent Decree.

More investigations will be conducted, and a final cleanup is required under the provisions of the Consent Decree.

2.3.4.6 Groundwater Management Plan

A number of non-aqueous phase liquid (NAPL) releases have occurred at the GE site over the years during the operation of the facility. In response to EPA and MDEP regulatory requirements related to these NAPL releases, GE is operating a system of NAPL recovery wells and NAPL containment barriers at the site. The primary purpose of these systems is to isolate the NAPL or remove the NAPL from the site so that it does not impact human health or the environment. To ensure that the NAPLs or the associated contaminated groundwater do not reach the Housatonic River or impact the air quality in local buildings and homes, GE will

continue to implement groundwater/NAPL monitoring, assessment, and response programs at the following Groundwater Management Areas (GMAs) (see Figure 2-5):

- GMA-1 (Plant Site 1) (including the 40s Complex, 30s Complex, 20s Complex, East Street Area 2-South, East Street Area 2-North, East Street Area 1-North, East Street Area 1-South, Lyman Street Area, Newell Street Area II, Newell Street Area I, and Silver Lake Area).
- GMA-2 (Former Oxbows J and K)
- GMA-3 (Plant Site 2) (including the portion of the Unkamet Brook Area east of Plastics Avenue).
- GMA-4 (Plant Site 3) (including the Hill 78 Consolidation Area, the Building 71 Consolidation Area, the Hill 78 Area-Remainder, and the portion of the Unkamet Brook Area west of Plastics Avenue).
- GMA-5 (Former Oxbows A and C).

2.3.4.7 Housatonic River Floodplain

Periodically, the low-lying areas bordering the Housatonic River are flooded during and after storms. During these storms, flood waters deposit river sediments on the floodplain. Because of the PCB contamination in the Housatonic River sediments, the floodplain area soils have become contaminated over the years as the flood waters deposit contaminated sediments on the floodplain.

GE initiated floodplain environmental investigations in 1988 and detected the presence of PCBs in floodplain soils. GE established that most of the PCB contamination was within the extent of the floodplain area inundated during a 7- to 8-year flood event (a storm event that occurs every 7 to 8 years, on average).

Under the provisions of the Consent Decree, GE will continue to investigate contamination in floodplain soils for the areas listed below. Figure 2-4 shows the locations of the floodplain properties identified in the Consent Decree.

Floodplain Current Residential Properties Adjacent to 1 1/2-Mile Reach- Actual/Potential Lawns

The 1 ½-Mile Reach is bounded by the Lyman Street Bridge (upstream) and the Confluence with the West Branch. This area includes the non-bank portions of approximately 35 residential properties along this reach, where actual or potential lawn areas are located within the floodplain.

Floodplain Non-Residential Properties Adjacent to 1 1/2-Mile Reach

As noted above, the 1 ½-Mile Reach is bounded by the Lyman Street Bridge (upstream) and the Confluence with the West Branch, including Fred Garner Park. This area includes non-bank portions of approximately 11 non-residential properties along this reach where such portions are located within the floodplain. Excluded from this area are those properties associated with the Former Oxbow Areas.

Floodplain Residential and Non-Residential Properties Downstream of Confluence

This area includes, with some exceptions, residential properties where actual or potential lawn areas exist within the floodplain, including approximately 12 residential properties between the confluence and Woods Pond Dam that constitute about 13 acres. In addition, the non-residential portion of the floodplain in this area constitutes about 1,100 acres of wetland and other natural habitats.

2.4 AGENCY/REGULATORY ACTIVITIES

MDEP and EPA have worked in concert to address the contamination on and off the GE Pittsfield facility and GE's cleanup activities.

2.4.1 Administrative Consent Order and Resource Conservation and Recovery Act

The site has been subject to investigations dating back to the early 1980s. Prior to the Consent Decree, the investigations were consolidated under two regulatory mechanisms: Administrative Consent Orders with MDEP and a Corrective Action permit with EPA under the Resource Conservation and Recovery Act (RCRA).

GE and MDEP have signed two sets of Administrative Consent Orders. The first Consent Order was signed in May 1981 and covered contamination at "the Plant," "areas in and around the Plant," and the Housatonic River. Two Consent Orders were signed in 1990. The May 1990 Consent Order covers the Housatonic River and Newell Street Area I. The June 1990 Consent Order covers East Street Area I, East Street Area II, Unkamet Brook, the Hill 78 Landfill Area, the "rest of the facility," and "related sites."

A revised Administrative Consent Order executed by MDEP and consented to by GE on November 13, 2000, is described in Subsection 2.4.2.2.

On February 8, 1991, EPA issued a RCRA Corrective Action Permit to GE for the GE facility in Pittsfield. The permit established a process and a schedule for the assessment and remediation of releases of hazardous wastes at, and from, the GE facility. GE appealed the permit, and it was subsequently revised and reissued effective January 3, 1994. The permit specifically addressed the 11 study areas (per MDEP listing) presented in Table 2-1.

In 1997, off-site properties that received contaminated fill from GE were also made subject to investigations and cleanup under the Administrative Consent Orders.

GE has performed investigations and short-term cleanups under the EPA RCRA permit and/or the Administrative Consent Orders with MDEP. The results of these actions and investigations are available in numerous documents, reports, letters, data packages, and other submittals to EPA and MDEP (see listing of Information Repositories in Attachment C of this Community Relations Plan).

2.4.2 EPA and MDEP Activities – 1997 to Present

2.4.2.1 National Priorities List

On September 25, 1997, EPA proposed to place the GE/Housatonic River Site on the National Priorities List (NPL). The NPL is EPA's list of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/ Superfund. The list is based primarily on the score a site receives from the Hazard Ranking System. The site received a Hazard Ranking System score of 70.71. Any site that receives a Hazard Ranking System score of 28.5 or higher is eligible to be listed on the NPL. The proposed NPL site covers all of the study areas listed in the RCRA permit and the Administrative Consent Orders (see Table 2-1). The GE/Housatonic River Site has not been listed on the NPL; however, as discussed in the following subsection, the Consent Decree includes the provision that if GE does not comply with the terms and timetables of the agreement, EPA retains its authority to list the site on the NPL. Additional information about the NPL, CERCLA, and Superfund is presented in the Glossary (Attachment B).

2.4.2.2 Negotiations

In October 1997, EPA, in combination with the U.S. Department of Justice, the Commonwealth of Massachusetts, the State of Connecticut, the City

of Pittsfield, and the State and Federal Trustees, formed an intergovernmental team and, with the assistance of a mediator, initiated negotiations with GE. The objective of the negotiations was to achieve a comprehensive agreement for cleanup of the entire site. In the interim, the public comment period on the proposed NPL listing was extended until May 1, 1998. On April 2, 1998, the negotiations were terminated without an agreement between the intergovernmental team and GE. Negotiations were resumed during the summer months of 1998, and in September 1998, the parties achieved an Agreement in Principle.

Consent Decree

On October 7, 1999, the parties lodged with the court a comprehensive Consent Decree agreement providing for cleanup of the Housatonic River and associated areas, cleanup of the General Electric Pittsfield Plant facility, environmental restoration of the Housatonic River, compensation for natural resource damages, and government recovery of past and future cleanup costs. On October 27, 2000, U.S. District Court Judge Michael A. Ponsor gave final court approval to the Consent Decree.

The Consent Decree was among GE; the United States, including EPA, Department of Justice, Department of Interior and National Oceanic and Atmospheric Administration; the Commonwealth of Massachusetts, including MDEP, Executive Office of Environmental Affairs, and the Massachusetts Attorney General; and the State of Connecticut, including Connecticut Department of Environmental Protection (CTDEP) and the office of the Connecticut Attorney General; the City of Pittsfield and the Pittsfield Economic Development Authority.

EPA is the lead agency, but MDEP has a review and comment role and is consulted by EPA prior to making decisions under the Consent Decree. By mutual agreement, various project management tasks have been divided between the two agencies to eliminate redundancies and better focus available resources.

The agreement includes the following major components:

- **I. Cleanup of Contaminated Areas—**Cleanup areas include the GE Plant Site including Silver Lake and Unkamet Brook; the former oxbows, including Newell Street commercial properties; the Housatonic River sediments, banks, and floodplain properties downstream of the GE Plant Site; and the Allendale School.

  Overall principles of the cleanup include:

  – Extensive sampling at GE and the non-GE owned properties.

- GE to perform the cleanups except on the 1 ½-Mile Reach of the Housatonic River.

- Provision for disposal of material and debris excavated from areas subject to the Consent Decree.

- Environmental Restrictions and Easements (EREs) to be placed on all GE-owned properties to ensure that current uses will not change.

- Two options for non-GE owned, non-residential properties: (1) cleanup that is protective of the current use with EREs, or (2) a conditional solution that provides a cleanup protective of current use and, instead of EREs, requires additional cleanup if the use of the property changes.

- Cooperative approach to managing cleanup activities.

- Parties have management system for project implementation to ensure that project is managed in a collaborative and cooperative manner.

- Public to provide input throughout implementation of the work.

- **II. Restoration of Natural Resources—**Agreement includes both primary restoration to compensate the public for natural resource damages by cleaning up valuable resource areas to the extent practicable and provide compensatory restoration to the public for natural resource damages that cannot be addressed through the cleanup. Additional details about the restoration of natural resources are described in the Summary of the Agreement presented in Attachment G.

- **III. Recovery of Government Costs—**GE has agreed to repay government costs incurred, within specific limitations.

- **IV. Effect and Form of the Consent Decree—**The settlement agreement is in the form of a federal court Consent Decree. EPA agrees to defer the final decision about whether or not to list the site on the CERCLA National Priorities List.

Additional actions include the following:

- **Enhanced Public Participation—**Expansion of the public participation process through the Citizen's Coordinating Council and by providing additional outreach (including public meetings, small neighborhood meetings, and individual meetings) to property owners affected by the agreement.

- **Brownfields Redevelopment and Economic Aid—**GE, the City of Pittsfield, and the Pittsfield Economic Development Authority (PEDA) (http://www.PEDA.cc) have entered into a Definitive Economic Development Agreement. Under this agreement, GE will clean up the plant site to agreed-upon Consent Decree standards, demolish several buildings, provide some funding for constructing new buildings, and transfer portions of the property to PEDA for economic redevelopment. In addition, GE will provide economic aid to the City of Pittsfield for 10 years and make upgrades to add aesthetic value to and enhance local habitat on the plant site and around Silver Lake.

As noted previously, in Subsection 2.3, the Consent Decree lists the following specific areas for cleanup:

- GE Plant Site, including Unkamet Brook and its floodplain, Hill 78 and Building 71 consolidation areas, and non-GE-owned property within the GE Plant Site.
- Groundwater.
- Former oxbow areas.
- Allendale School.
- Residential properties in 1 ½-Mile Reach and downstream of 2-Mile Reach of Housatonic River.
- Nonresidential areas in 1 ½-Mile Reach of Housatonic River.
- Silver Lake.
- Housatonic River-Upper ½-Mile Reach.
- Housatonic River-Next 1 ½-Mile Reach from the Lyman Street Bridge to the Confluence of the East and West Branches.
- Housatonic River-Rest of River – Contaminated river sediments, banks, and floodplain areas (other than actual or potential lawns) downstream of the confluence with the West Branch.

Additional information about the Consent Decree is presented in the Summary of the Agreement (Attachment G) and in Subsection 3.3.

Administrative Consent Order

A revised Administrative Consent Order (ACO) was executed by MDEP and consented to by GE on November 13, 2000. The revised ACO supersedes two 1990 ACOs between MDEP and GE and provides for

continued assessment of remediation of off-site properties contaminated with fill from the GE Pittsfield facility (including East Street Area 1 - South), and includes a streamlined process for the residential fill properties.

2.4.2.3 EPA and MDEP Residential Efforts

From the 1940s through the early 1980s, GE gave away thousands of tons of fill from its facility to Pittsfield-area homeowners and contractors. When it became apparent that the GE fill was potentially contaminated with PCBs, EPA and MDEP worked with the community to identify properties that may have received contaminated fill. Although GE initiated sampling and soil removal activities at many of the identified residential fill sites in 1997, EPA and MDEP also undertook a sampling program to determine the presence of contamination at other residences suspected of having received contaminated fill.

EPA and MDEP have conducted numerous activities at the site serving a variety of purposes, including identifying potentially contaminated properties, informing the public about PCBs, and advising residents of protective actions to be taken.

A number of residential floodplain properties along the Housatonic River were sampled by EPA, and Short-Term Measures were implemented at some of these properties. At Deming Street, a major cleanup effort has been completed to remediate contaminated soils to an average PCB concentration of 2 ppm at depths of up to 4 feet. In addition, EPA has recently undertaken its own floodplain sampling efforts to determine the level and extent of the floodplain contamination downstream of the GE facility. Portions of many residential properties along the Housatonic River fall within the river's floodplain and may have been impacted by the PCB contamination.

In an effort to advise and inform the public about PCBs, MDEP and EPA jointly issued two fact sheets in August 1997 to the residents of Pittsfield. One fact sheet, entitled "Polychlorinated Biphenyls (PCBs)—A Fact Sheet" discussed PCBs and answered commonly asked questions regarding PCB exposure at the GE and Housatonic River hazardous waste sites. The second fact sheet, dated August 7, 1997, entitled "Residential Properties Which May Contain Contaminated Fill from the General Electric Company," responded to additional questions regarding the sampling efforts in residential areas. This fact sheet on the residential properties was updated September 24, 2001, and a public meeting was held on November 7, 2001.

In March 1998, MDEP and EPA issued an update of the cleanup of the residential properties. The update was entitled "U.S. EPA and MDEP

Environmental Update for the Berkshires." The update discussed the investigative and cleanup processes and presented questions and answers regarding soil sampling. Copies of the fact sheets/update mentioned in this section are presented in Attachment H.

In April 1998, Pittsfield residents received a letter from John DeVillars, Regional Administrator for EPA New England. The letter introduced an action plan that EPA developed because the negotiations had failed at that time. EPA provided residents with a summary of EPA's Action Plan entitled "An Action Agenda for Economic and Environmental Recovery in Pittsfield and Berkshire County." A copy of the Action Plan is presented in Attachment H.

On April 7, 1998, EPA began a neighborhood canvassing effort in the Lakewood neighborhood to inform residents and answer questions about Berkshire County PCB cleanup activities. On April 21, 1998, EPA conducted personal interviews with residents in neighborhoods where PCB contamination was found. The interviews helped to identify other potential properties to sample for PCBs.

Other EPA and MDEP activities in relation to the residential fill include the following:

- Prior to beginning remediation activities, MDEP and EPA provided fact sheets describing the proposed remedial activities to most of the affected neighborhoods. Fact sheets were distributed by door-to-door hand delivery and by mail.

- MDEP provided to public interest groups GIS-generated maps that indicated the locations of the properties that had been sampled.

- Upon request, MDEP provided public interest groups with updated status lists for residential fill properties that had been sampled and/ or remediated to date.

- In fall 1997, representatives of MDEP and EPA began holding office hours 1 day per week for residents dealing with the contaminated fill issue. These office hours were established to enable the public easy access to MDEP's and EPA's representatives regarding residential fill-related issues. The office hours continued through mid-October 1998.

As of December 2001, GE had sampled 315 properties, of which 201 had average total PCB concentrations in excess of 2 ppm. GE has remediated 164 properties, including 25 properties remediated in 2001. GE is targeting five additional sites for remediation in 2002.

2.4.2.4 Removal Actions

GE Building 68 Area

Building 68 is located along the western bank of the Housatonic River within GE's facility upstream of the Lyman Street Bridge. In the late 1960s, a PCB storage tank associated with Building 68 and containing liquid PCB Aroclor-1260 collapsed, releasing a portion of its contents onto bank soils and river sediments. It was estimated that approximately 1,000 gallons of liquid PCBs were released to the riverbank. The liquid PCBs contained in the tank were heated and quickly cooled and solidified into a wax-like substance upon release from the tank; consequently, migration of the material was limited. However, some of the solidified material entered the river and settled to the bottom. Visual contamination, including impacted bank soils and sediment, were removed at the time of the release. However, investigations in this area in March 1996 for the East Street Area 2 site identified additional material, including dense nonaqueous phase liquid (DNAPL), which was not removed during the original removal action in 1968 or which was the result of additional releases.

In December 1996, EPA determined that a Superfund removal action was warranted, and issued GE a Unilateral Administrative Order containing a scope of work and schedule. GE was notified by the State that the provisions in the EPA Unilateral Administrative Order were being adopted for use under its Administrative Consent Order. In January 1997, GE, EPA, and Commonwealth officials met to discuss the terms of the removal action. In February 1997, GE submitted a draft Work Plan. EPA provided GE with comments on the Work Plan and met periodically with GE between February and May 1997. In May 1997, GE submitted a revised Draft Work Plan, which was conditionally approved by EPA in June 1997. In June 1997, GE's remediation contractor mobilized to the site.

The sediment removal was conducted by driving sheetpiling into the river bottom to divert river water around the excavation. The excavation was divided into seven "cells" that were excavated in a series. Cells that had yet to be excavated were used to stockpile removed sediments, allowing them to drain. The sediment removal was completed first, before beginning work on the riverbank soils. The only exception to this was a small area of saturated soils on the bank that had to be removed prior to work in the river as a result of stability issues.

Sediment and riverbank soils were removed using a long-reach excavator. All of the sediment and a majority of the riverbank soils were taken off-site to a TSCA landfill. The remainder of the riverbank soils failed Toxicity Characteristic Leaching Procedure (TCLP) for lead and were sent to a RCRA/TSCA landfill and stabilized with cement.

Two of the seven cells were excavated to a depth 2 to 4 ft deeper than planned as a result of higher than expected concentrations of PCBs at depth. The deepest part of the excavation extended to 8 ft below the river bottom. The planned excavation volumes for sediment and riverbank soils at Building 68 were 1,250 yd^3 and 1,000 yd^3, respectively. The actual quantities of material excavated and disposed of off-site were 5,000 yd^3 (9,509 tons) for sediment and 2,330 yd^3 (3,513 tons) for riverbank soils. The volumes were estimated as "in-place" cubic yards and the weights were determined by measurements at the off-site disposal facility.

Restoration of the area was accomplished by backfilling the excavations with clean fill to a level approximately 16 inches below the initial grade. A 10-inch-thick layer of riprap was placed over the fill and a 6-inch layer of sand was installed as the final cover.

Housatonic River from Newell Street in Pittsfield to the Confluence

On June 3, 1998, EPA issued GE an Administrative Order/Action Memorandum for a Removal Action. The order specified the removal action area as the section of the East Branch of the Housatonic River from Newell Street in Pittsfield to the confluence of the East and West Branches of the Housatonic River. This stretch includes the Upper ½-Mile Reach, which extends from Newell Street to Lyman Street (subject to a "time-critical" Removal Action as described in the Action Memorandum), and the 1 ½-Mile Reach, which extends from Lyman Street to the confluence (subject to a "non-time-critical" Removal Action as described in the Action Memorandum). The order identified PCBs as the primary contaminants of concern for this area. EPA determined the removal action was necessary to protect public health and welfare and the environment, and to prevent any further release or threat of release of hazardous substances at or from the site.

The Upper 1/2-Mile Reach

The order required GE to perform the following scope of removal activities for the Upper ½-Mile Reach:

- Implementation of temporary measures to limit access and exposure to contaminated areas throughout the site. These measures may include the installation of fencing, repairs to existing fencing, installation of warning signs, inspection and maintenance of fences and warning signs, covering of contaminated soils, and/or soil removal, and public education.

- The elimination or mitigation of all current and potential sources of PCBs and other hazardous substances from entering into the East Branch of the Housatonic River and/or Housatonic River sediments.

- The development and implementation of a monitoring plan(s) to assess compliance with the performance standards for source control measures specified in the second bullet.

- The removal of contaminated sediment and riverbank soils located between Newell and Lyman Streets as a "time-critical" Removal Action.

- The backfilling and restoration of the river sediments and riverbank soils between Newell and Lyman Streets.

- The treatment/disposal of contaminated sediments, soils, debris, and other materials generated during the removal action.

GE initiated cleanup activities for the ½-Mile Reach in October 1999, and the ½-mile cleanup is scheduled to be completed in summer 2002.

The 1 ½-Mile Reach: Engineering Evaluation/Cost Analysis

In response to the requirements of the Action Memorandum, and in accordance with CERCLA guidance for Non-Time Critical Removal Actions, EPA conducted an Engineering Evaluation/Cost Analysis (EE/CA) to consider remedial alternatives to address contamination in the 1 ½-Mile Reach. The EE/CA portion of the site consists of a 1 ½-mile stretch of river beginning at Lyman Street (the downstream limit of the Upper ½-Mile Reach removal action being conducted by GE) and ending at the confluence of the East and West Branches of the Housatonic River.

The EE/CA Report (WESTON, 2000) presents an analysis of alternatives to address contamination in river sediments, banks, and floodplain soils within the EE/CA Reach of the Housatonic River. During the 45-day comment period, public information meetings were held in Pittsfield, MA, and Kent, CT, on July 25, 2000 and August 9, 2000, respectively, to discuss the recommended cleanup alternative presented in the EE/CA. A formal public hearing was held in Pittsfield, MA, on August 15, 2000 to receive initial public comments. The formal comment period ended on September 1, 2000.

EPA published its response to comments on the EE/CA and its intended remediation approach in an Action Memorandum dated November 21, 2000. The approach involves dry excavation and removal of bank soils and sediments to be accomplished in three phases of work. The first phase, from Lyman Street to approximately 1,600 feet downstream, will use sheetpile diversion of the river to allow dry excavation. The second phase, from upstream of Elm Street (1,600 feet downstream of Lyman Street) to downstream of Dawes Avenue, will use a pumped bypass of river water for diversion. The third phase, from downstream of Dawes Avenue to the confluence, will use either sheetpile diversion or pumped

bypass, depending on EPA's experience in the upstream reaches. It is currently estimated that approximately 100,000 cubic yards of PCB-contaminated soil and sediment will be removed and disposed/ consolidated for this removal action. Up to 50,000 cubic yards will be placed in GE's On-Plant Consolidation Areas (OPCAs). The remainder will be disposed at licensed off-site facilities. Restoration of excavated areas will incorporate state-of-the-art habitat enhancement techniques and will be designed to encourage re-growth of non-invasive, native plant species.

3. COMMUNITY BACKGROUND

According to the Berkshire Regional Planning Commission, the population of Berkshire County was 134,953 residents in 2000. Of this total, 45,793 of these residents, or about 34% of the population, live in the City of Pittsfield, making it the largest city in the county. Pittsfield, located in the center of the Berkshire Hills of western Massachusetts, is the government seat of Berkshire County. According to the 2000 United States Census, the median age in Pittsfield is 40.6, and in Berkshire County, the median age is 40.5.

Pittsfield is home to several national and global industries with deep roots in Berkshire County. These companies include GL&V/Dorr-Oliver, Inc., General Dynamics Defense Systems, K-B Toys, and Berkshire Health Systems. The city is known as the "Plastics Technology Center of the Nation" because of the large number of plastics companies, including GE Plastics, located in the city and linked through the Berkshire Plastics Network. Although the total number of jobs in Pittsfield has remained relatively static over the last 20 years, there has been a significant shift in the focus of those jobs from manufacturing to the service industry.

A victim of an overall decline of manufacturing in New England and of defense spending cutbacks, the city's manufacturing base has declined over the last several decades. Despite this, Pittsfield is considered the industrial center of the Berkshires. From 1993-1995, it ranked as the fastest growing exporter in New England. Manufacturing accounted for 65% of the revenues coming into the county (*Berkshire Relocation Guide*, 1998). Today, Pittsfield has converted a former paper mill for use as a business complex, while in North Adams, the former Sprague Electric complex is the new home of the Massachusetts Museum of Contemporary Art; a computer animation firm; and media, e-commerce, and publishing businesses (*Berkshire Relocation Guide*, 1998).

Pittsfield, founded in 1761, was named after British Prime Minister William Pitt (who would later take up the American colonists' cause before the revolution). In the 1800 census, Pittsfield's 2,261-person population put it on relatively equal status to almost a dozen other communities in Massachusetts at the time, including New Marlboro (1,848), Tyringham (1,712), and Sandisfield (1,857).

Pittsfield is a medium-sized city with many of the cultural amenities found in larger cities. It is home to the Pittsfield Mets, the Class A affiliate of the New York Mets. Pittsfield is part of Berkshire County's long tradition of arts and culture. Specifically, the county boasts more than 30

performing and visual arts organizations such as the Williamstown Theatre Festival, the Berkshire Theatre Festival, and Jacob's Pillow Dance Festival. More than a dozen museums and historic sites are located in Berkshire County, including the Pittsfield home of novelist Herman Melville, Arrowhead, where he wrote *Moby Dick*. In addition, Berkshire County is home to the Berkshire Museum; the Norman Rockwell Museum; and Chesterwood, the 1920s summer home of sculptor Daniel Chester French. Pittsfield is located approximately 20 minutes from Tanglewood, the world-renowned 526-acre summer home of the Boston Symphony Orchestra. Every year, more than two million people visit Berkshire County.

Pittsfield is home to the Berkshire Community College and the University of Massachusetts MBA program, Pittsfield Campus (*Berkshire County Relocation Guide,* 1998).

Berkshire County is well known for its recreational attractions and open space. Designated forests and parks of the Berkshires of Massachusetts form a 270,000-acre state forest and park system, one of the largest in the United States. The Berkshires include the first state park in the United States, the Mount Greylock Reservation. The two million visitors to Berkshire County each year are an essential part of Berkshire County's economy. Many of these visitors are attracted to the county's ski resorts, hiking and biking trails, and use the Housatonic River for canoeing, kayaking, sailing, and recreational fishing.

3.1 GOVERNMENT

The City of Pittsfield is represented by a mayor and a city council made up of 11 members. There are seven wards within the City, and each ward elects a representative to city council. In addition, four members are elected at large, representing all of Pittsfield. All members of the city council and the mayor are elected to 2-year terms. In addition, the Pittsfield City Clerk is elected to a 2-year term. Elected officials are not restricted to term limits. The last mayoral election was held in November 2001.

Berkshire County is comprised of 30 towns and 2 cities, Pittsfield and North Adams. There is a county advisory board made up of 32 members:

- Thirty members are the Chairmen of Boards of Selectmen (the governing bodies of each town within the county).
- Two members are mayors from the two cities (Pittsfield and North Adams) located within the county.

All members of the County Advisory Board hold 2-year terms, unless otherwise specified under local election rules.

3.2 SITE NEIGHBORHOOD

The closest residential neighborhood to the site, known as Lakewood, includes, among other streets, Longfellow, Dorchester, and Edison Avenues. Information about the residential property sampling program and the removal of contaminated fill is presented in Subsection 2.4.2.3.

3.3 CHRONOLOGY OF PUBLIC INVOLVEMENT

Members of the general public have been concerned about the Housatonic River and GE facility disposal sites for a number of years. Residents in the Pittsfield community and towns along the course of the Housatonic River have been concerned about the extent of contamination and the process of remediation in and around the river and the GE facility. Specifically, the Berkshire County Regional Planning Commission, the Housatonic River Watershed Association (HRWA), and the State of Connecticut have been involved in the Housatonic River investigation and assessment since PCB contamination was first discovered in the Housatonic River in the 1970s.

The Housatonic Valley Association (HVA), a nonprofit watershed conservation organization founded in 1941, began sampling for PCBs in the Housatonic River in 1974. HVA brought public attention to the PCB issue by conducting public forums and meetings, and organized the first interstate PCB meetings with federal and state officials. HVA also co-chaired the first PCB Watchdog Committee established by U.S. Congressman Toby Moffett, served on Connecticut's PCB Program Guidance Committee, and successfully fought for state funding for PCB-related fish and health studies.

Figure 3-1 presents significant milestones of the GE/Housatonic River site. A chronology of events related to the GE/Housatonic River Project, including those associated with public involvement, is presented in Attachment I.

In August 1992, the Housatonic River Initiative (HRI) was formed by a consortium of individuals and organizations in Berkshire County, including representatives of elected officials, the Berkshire Natural Resources Council, the Housatonic Valley Association, and the Housatonic River Association. One of the major objectives of HRI is to ensure that information on the remedial planning process for the Housatonic River and all GE Pittsfield disposal sites is communicated to all affected communities.

MDEP (formerly known as the Massachusetts Department of Environmental Quality Engineering) has been involved in investigations and remedial cleanup at the Housatonic River site since 1981. An important part of MDEP involvement has been the planning and implementation of a variety of public involvement initiatives. These initiatives have included the preparation of a Public Involvement Plan, which was released in June 1990 and extensively revised in April 1995.

The Public Involvement Plan was developed based on input from community interviews conducted in 1990. In addition, MDEP developed a mailing list that has been used to distribute information about the site, and notify local officials and residents of major milestones and events. MDEP, with the assistance of EPA, also developed fact sheets, including "Residential Properties Which May Contain Contaminated Fill From GE" and has conducted a number of public meetings since 1990.

In 1991, EPA issued a RCRA Corrective Action Permit to GE which established a process and implementation schedule for environmental assessment and cleanup work at GE. Since then, EPA has assisted in a variety of negotiations aimed at reaching an appropriate cleanup settlement with GE.

A legal agreement was signed by MDEP and EPA in June 1992. This agreement provided for coordination between the agencies in relation to implementing remedial actions required of General Electric/Pittsfield in accordance with EPA's RCRA Corrective Action Permit and MDEP's May and June 1990 Administrative Consent Orders. A Memorandum of Understanding (MOU) was the result of an appeal of the Corrective Action Permit by MDEP. The MOU also contains provisions for the orderly resolution of any disputes that may arise between EPA and MDEP during the implementation of the permit and consent orders.

An important part of EPA's involvement has been the development of new, and the enhancement of existing, public involvement activities. EPA activities have included the development of a variety of fact sheets, including "Human Health Risk Evaluation and Ecological Risk Assessment Regarding PCB Contamination in Pittsfield." In addition, EPA and MDEP have issued joint fact sheets. They are "Polychlorinated Biphenyls at the Hazardous Waste Sites Associated with the General Electric Pittsfield Facility" (August 1997) and "USEPA and MDEP Environmental Update for the Berkshires: Residential Fill Properties Investigative Process" (March 1998). These fact sheets are presented in Attachment H.

EPA also conducted community interviews in July 1997 (see Subsection 3.7 for a summary of the community concerns expressed during the interviews). On December 8 and 9, 1997, focus groups were held in Pittsfield, MA, with groups of residents affected by the GE/Housatonic River Site. EPA also conducted telephone surveys during the winter of 1997 – 1998. As a result of the focus groups and telephone surveys, five major areas of concern were described by participants:

- Participants desired a published schedule of the work that would be done and when it would be done, especially work related to their residential properties.
- Participants stated that residents were concerned about property values.

- They expressed concern about PCBs, and this concern was heightened by a lack of reliable information. They desired information on the nature of PCBs, including health risks; how PCBs migrate in the environment; what are normal levels, as opposed to acceptable levels; and a comparison to the PCB levels found in Pittsfield.
- Survey and focus group participants wanted more personal communications, with information presented in plain English and at more regular intervals, before they read newspaper articles about the GE/Housatonic River Project.
- Participants stated that they had been waiting for someone to take charge, and they expressed a strong desire to have one agency lead the project, hold GE accountable, and make progress at the site.

On August 7, 1998, EPA held a public meeting to outline its involvement, provide information on site contamination, and provide the public with an opportunity to voice concerns about the site.

In spring 1997, the organization Citizens for PCB Removal became involved with PCB removal in the community. In winter 1998, Get Real (Residents Environmental Action League) became active in the residential soil cleanup project.

The Housatonic Environmental Action League, Inc. (HEAL), which was founded in 1997, is a non-profit coalition of citizens and organizations dedicated to the protection of the Housatonic River watershed and corridor. HEAL acts as a government and corporate watchdog on river protection issues and is involved with the ongoing issue of long-standing PCB pollution and other toxins that contaminate the river system. As an advocate for the natural environment, HEAL identifies and responds to potential environmental crises, educates the community for greater awareness of relationships with the environment, and participates in shaping the decisions that affect the environment.

Housatonic River Restoration, a broad-based coalition of interested and concerned individuals and representatives from many organizations who use and appreciate the Housatonic River, became active in 1998. The organizations have come together to ensure maximum and ongoing public participation in the process to rehabilitate and restore the river system.

In September 1998, an Agreement in Principle was signed among GE, EPA, MDEP, Connecticut Department of Environmental Protection, MA Office of the Attorney General, CT Office of the Attorney General, U.S. Department of Justice, NOAA, U.S. Department of the Interior, MA Executive Office of Environmental Affairs, and the City of Pittsfield. As part of the Agreement in Principle, the negotiating parties asked the Massachusetts Office of Dispute Resolution (MODR) to convene a

Citizens Coordinating Council (CCC). The CCC met for the first time on November 4, 1998, and meets monthly.

In October 1999, a Consent Decree was signed and lodged in District Court. The Consent Decree was among GE; the United States, including EPA, Department of Justice, Department of Interior and National Oceanic and Atmospheric Administration; the Commonwealth of Massachusetts, including MDEP, Executive Office of Environmental Affairs, and the Massachusetts Attorney General; and the State of Connecticut, including CTDEP and the office of the Connecticut Attorney General; the City of Pittsfield and the Pittsfield Economic Development Authority.

The following activities occurred in relation to the Consent Decree:

- A CCC meeting was held on October 26, 1999.
- EPA held office hours at the Pittsfield office on November 3 and 4, 1999, from 9 a.m.– 5 p.m. to meet with individuals and groups/organizations that wanted to learn more about the Consent Decree.
- A public information meeting on the Consent Decree was held on November 16, 1999.
- On December 2, 1999, a public hearing was held on the Consent Decree and the proposed RCRA Permit revisions.
- The original public comment period was from October 26 to December 26, 1999.
- Two separate extensions were made to the public comment period, each for 30 days, making the final end of the public comment period February 23, 2000 (120-day public comment period).

EPA enhanced public participation in relation to the Consent Decree through many additional mechanisms, including the following:

- Mailing a summary of the Consent Decree to the EPA mailing list for the site.
- Placing the Consent Decree and Statement of Work for the Removal Actions Outside the River ("Statement of Work"), as well as the Summary of the Consent Decree ("Summary of the Agreement"), on the EPA web site devoted to the site.
- Placing the Consent Decree and all appendices in the following Berkshire County and Connecticut locations:
  - Berkshire Athenaeum Public Library, Pittsfield, MA.

- Berkshire County Chamber of Commerce, Pittsfield, MA.
- Lenox Public Library, Lenox, MA.
- Simon's Rock College of Bard, Great Barrington, MA.
- Berkshire Regional Planning Commission, Pittsfield, MA.
- Housatonic River Initiative, Pittsfield, MA.
- Oliver Wolcott Library, Litchfield, CT.
- Housatonic Valley Association, Cornwall Bridge, CT.
- Cornwall Public Library, Cornwall, CT.
- Kent Memorial Library, Kent, CT.

- Providing to requesters individual paper copies of the Consent Decree, or paper or CD/ROM copies of the Statement of Work.

- Hosting a Lenders Forum on January 20, 2000, for property owners who would be affected by the work at the GE facility and Housatonic River sites.

The Consent Decree, which was entered on October 27, 2000, requires continued substantial public participation in relation to the activities to be performed and the decisions to be made under the Decree, as discussed below:

- The Consent Decree requires GE to cooperate with EPA and MDEP in implementing EPA's community relations plan for the site, in providing information regarding work plans to the public, including the CCC, and in participating in public meetings. The Consent Decree also requires all parties to the Consent Decree to coordinate and cooperate with the CCC. Additional information on the CCC is presented in Section 4, Community Involvement Techniques.

- For the Removal Actions Outside the River (as defined in the Consent Decree), GE is required by the Decree to submit to EPA for approval various work plans for the necessary pre-design investigations and the design and performance of these removal actions. EPA intends to seek CCC input on these work plans. In addition, documents submitted to EPA for approval are subject to review and comment by both EPA and MDEP, and decisions are issued after consultation with MDEP.

- With regard to the 1 ½-Mile Reach of the River, in accordance with the Consent Decree, EPA consulted with MDEP and the CCC and provided a period of public comment on its proposed removal action prior to selecting that action. EPA held a meeting with the CCC on March 1, 2000, at which it presented and explained its draft Engineering Evaluation and Cost Analysis (EE/CA) of cleanup alternatives for the 1 ½-Mile Reach. EPA continued the consultative

process by providing a public comment period on its proposed removal action, as required by the Consent Decree.

- With regard to the Rest of the River, for which the Consent Decree does not prescribe a remedy but rather sets forth a process for selecting a remedy, the Consent Decree provides substantial opportunities for public comment and input in this process. These include: (1) EPA's provision of scopes of work for its risk assessments on the Rest of the River to be reviewed by and discussed with interested parties; (2) an opportunity for interested parties to submit comments and make an oral presentation to the peer review panels that will review EPA's risk assessments and modeling activities; and (3) public notice and an opportunity for public comment on EPA's proposed Remedial Action for the Rest of the River.

In addition to these more formal mechanisms, through the last several years, EPA and MDEP staff have been continually available to meet with the community informally.

Additional public involvement activities are described in the Project Chronology (Attachment I).

3.4 PUBLIC HEALTH

The principal focus of public health concerns is potential exposure to and adverse health effects from PCB contamination. The concern centers around the Housatonic River and its floodplain. Chemicals other than PCBs may also be of concern, including volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and metals. Soils, groundwater, sediments, surface water, and biota have been impacted and serve as potential sources of exposure to the human population, now and in the future. The populations who may be the most affected include local residents along the floodplain, children, farmers, recreational visitors (i.e., hikers, swimmers, waders), hunters and fishermen, and the commercial/industrial community.

The PCB contamination arises from several historic sources, and these sources include stormwater system discharges directly into the Housatonic River; migration of PCB contamination from soils to groundwater; contaminated groundwater discharges to surface waters; and the use of PCB-contaminated soils as fill material in the Pittsfield community (e.g., former oxbows, residential properties, and Allendale School) and related areas. Migration and redistribution of contaminated sediments within the Housatonic River have further resulted in contamination detected in the floodplain soils downstream of the site. Bioaccumulation and cycling of PCBs within the terrestrial and aquatic food chains could have a major impact on humans through consumption

of game, turtles, ducks, fish, and other species. Also, local residents and farmers may consume vegetables, beef, and/or dairy milk raised in areas of the floodplain that have been contaminated by PCBs.

During 1997, respondents at EPA focus group sessions indicated that they were concerned about the PCB-contaminated soil. This concern was heightened by a perceived lack of reliable information. Specific topics of concern included:

- How PCBs migrate through the environment.
- How an individual is exposed to PCBs and which (if any) path of exposure (breathing, drinking, or touching) presents the greatest health risk.
- The definition of normal levels of exposure compared to what is present in Pittsfield and on individual properties.
- The health risks associated with PCB exposure.

EPA, MDEP, Massachusetts Department of Public Health (MDPH), and local citizen groups have issued a number of fact sheets highlighting citizens' concerns. Selected fact sheets are presented in Attachment H of this document. The fact sheets cover subjects such as PCB serum levels in local residents, potential risks to children and teenagers playing near the Housatonic River, fish consumption advisories, cleanup proposals and actions along the Housatonic River, information hotlines, expert panel findings, and Agency for Toxic Substances and Disease Registry (ATSDR) public health assessments. MDPH has instituted several programs including evaluation of cancer incidence in the Housatonic River area, studies of the association of PCBs with local breast cancer incidence, potential extensions of the occupational health studies of workers at the GE facility, and public health education outreach programs.

Focus group respondents and individuals attending a 1997 public meeting were particularly concerned about the effects that PCBs would have on their children. Individuals expressed concern about the reliability of soil tests and the proposed cleanup initiative that would result in the excavation and removal of the contaminated soils.

The community's concern about health issues has also focused on PCB contamination in the Housatonic River. In 1982, a fish consumption advisory was issued for nearly 100 miles of the Housatonic River downstream from the Pittsfield site. This fish advisory resulted in the posting of signs warning people not to eat fish, frogs, and turtles caught in the Housatonic River. These signs read: "Warning - Housatonic River Fish Contaminated with PCBs; Do Not Eat Fish." Additional signs were posted around Silver Lake in 1994. The signs posted have the following

language: "Warning: No Trespassing; PCBs Present in Silver Lake at Concentrations that May Be Harmful to Humans."

3.5 ENVIRONMENTAL AND BUSINESS CONCERNS: GE'S IMPACT ON THE PITTSFIELD AREA

GE is an important part of Pittsfield's history. From 1902 to the mid-1980s, the GE facility in Pittsfield housed several divisions. At its peak of operations during World War II, approximately 13,000 people worked at GE. Even as late as the early 1980s, 8,000 jobs still remained in Pittsfield. Today, GE Plastics is the only division remaining in Pittsfield. Several hundred employees work in this field. With the loss of jobs at GE, came a slow economic decline that is still evident in Pittsfield today. As a result, there is a general concern in the community about the fate of the 254-acre GE facility and the promotion of Pittsfield's economic redevelopment. According to newspaper articles and editorials, many business leaders and residents hope to see an expeditious cleanup process in at least some portions of the site in order to pave the way for redevelopment. The 1997 layoff of 650 workers from the Pittsfield General Dynamics plant intensified the community's concern about initiating a cleanup process that will facilitate economic growth while protecting public health. For many residents, the prospect of mounting unemployment, coupled with the stigma of widespread contamination, has created a need to initiate a cleanup process that will protect public health while minimizing the damage to Pittsfield's reputation as a desirable place to live and work.

Tourism is also an important economic concern. Tourism is Berkshire County's largest industry, and some newspaper articles suggest that the industry may be affected by the "stigma" of a river that contains some of the highest concentrations of PCBs found anywhere in the United States.

Property values are another important economic concern, particularly for those individuals living near the GE facility. During EPA's focus group, many respondents expressed concern over the long- and short-term effects that the PCB contamination would have on their ability to sell their homes. For many, cleanup within the residential communities close to the GE facility is a priority, and these individuals are anxious to receive information on the effect properties contaminated with PCBs will have on the value of nearby properties and surrounding neighborhood properties.

3.6 TRUST AND COMMUNICATION

Trust and communication were common themes expressed during the 1997 focus group, at a 1997 public hearing, and in numerous newspaper editorials. Many Pittsfield residents are skeptical about the degree to which they can trust GE to conduct the cleanup and government agencies to supervise the cleanup. Many residents believe that they have not been

provided adequate information and that they often do not know the source of the information and whether it is reliable. Focus group attendees voiced concern that information was not equitably distributed. Some residents received information while others did not. In addition, respondents were concerned about the reliability of the information they were receiving. This problem was compounded by the fact that the respondents did not fully understand the difference between MDEP and EPA. Some residents stated that they wanted to communicate with individuals and agencies they can trust and that this trust had not been established.

3.7 SUMMARY OF COMMUNITY INTERVIEWS

EPA conducted community interviews on July 24, 28, and 31, and August 7, 1997, in Pittsfield, Massachusetts. Twenty-one individuals participated in the interviews. The interviewees included local public officials, homeowners with contaminated properties, business owners with contaminated commercial properties, residents living in neighborhoods with contaminants in the soil and river, a local public health professional, and environmental group members. Please note that the interviews occurred prior to the Consent Decree; also, the opinions of these interviewees may not necessarily reflect the opinions of all of the residents affected by the GE site contamination.

3.7.1 Description of Community Interviews

EPA asked 13 questions of the 21 interview participants. EPA informed each interviewee that the purpose of the community interviews was to identify community attitudes and concerns regarding the GE/Housatonic River Site. The information from the community interviews was used in developing this Community Relations Plan and EPA's communications program.

EPA explained to the interviewees that their responses would remain confidential in the Community Relations Plan. The interview responses and subsequent analyses were used to determine the issues important to the community and to identify effective outreach techniques. The interview questions were also designed to assess the extent and depth of the community's knowledge about the GE/Housatonic River Site.

EPA noted the age and the length of time an interview participant had lived in the Pittsfield area. Generally, most of the interviewees were in their 40s and had lived in Pittsfield all of their lives. Most of the interviewees had been aware of/concerned about the GE contamination site for more than 10 years. Nineteen of the 21 interviewees said they were "familiar" or "somewhat familiar" with the wastes GE has created and why the wastes are a problem.

The following sections present the opinions expressed by the interviewees.

3.7.2 Overview of Key Community Concerns

Overall, the community was greatly concerned about the GE/Housatonic River Site and the future of the City of Pittsfield. Persons interviewed identified the following primary areas of concern most frequently during the interviews:

a)	Health issues	16
b)	Allendale School	12
c)	Negative perceptions about GE	12
d)	Protection/restoration of the local environment	9
e)	Commercial and residential contamination/depressed real estate values	8
f)	Economy of Pittsfield	8
g)	Cleanup activities and decisions	5
h)	Other sources of contamination	2
i)	GE facility	1
j)	GE employees health study	1

3.7.2.1 Health

Sixteen interviewees expressed health issues as a concern. Several interviewees stated that the community has the highest cancer rate in Massachusetts and that PCBs were the suspected cause of cancer in area residents. Several individuals noted a high rate of breast cancer in the area. Other interviewees noted a high death rate from cancer and identified family members, friends, and colleagues who had died of cancer.

Several interviewees referred to fear of past, current, and future health problems in the community. Interviewees mentioned fear of eating contaminated vegetables grown in home gardens in which the soil was contaminated with PCBs; fear of developing cancer; fear about the long-term and animal/food chain-related health issues; and fear for the health of the children as they played in their yards and the Allendale School yard and ate home-grown vegetables. One man explained that his wife died of a liver ailment that he suspected could have been caused by PCBs. Another man believed his daughter's skin disease might have been related to PCBs. One interviewee noted that the information in health and ecological studies was difficult to quantify.

Several interviewees mentioned that there was a lot of unwarranted fear. One interviewee said there was hearsay regarding the large number of

cancers in the community; however, there had been no study (research) related to the health issues. Another individual mentioned that people had heard a lot of things about illnesses and made assumptions. One person stated that it was unknown exactly what might or might not have caused the health problems of the residents.

Other interviewees offered their impressions related to the PCB contamination. One person remarked that people thought that if they had PCB contamination on their property, it would make them ill. Another interviewee said people who were house hunting were avoiding the Lakewood neighborhood. The interviewee continued by saying that there was a mentality that people could not sell their homes and that their kids would die from PCB exposure. Another interviewee was concerned that at the small businesses located on contaminated oxbows, employees were sitting outside and eating their lunches and taking coffee breaks on contaminated soil.

Interviewees commented on the Massachusetts Department of Public Health's blood studies. One interviewee said it was unfair for people to have to pay for their blood tests in order to participate in the health study, and when they complained, the Commonwealth did not respond. In addition, the interviewee said people learned from the blood studies that they might have been exposed to PCBs, but they did not know what PCB concentration was safe or acceptable.

3.7.2.2 Allendale Elementary School

Twelve interview participants spoke about their concerns regarding Allendale School. One interviewee said that the best solution to the Allendale School problem would be to remove the entire cap. This individual was concerned about exposure during school renovations. A second interviewee was concerned about the remediation activities at the school. The interviewee desired answers to two questions: "What happens to Allendale School when they begin digging for the new addition and children are playing near the excavation? What happens when trucks drive through the neighborhoods?"

3.7.2.3 General Electric Company

Although 12 interviewees stated that they were treated poorly by GE, generally interviewees provided both positive and negative opinions of GE. A few interviewees stated that they believed that GE had mistreated its employees. Another person said that local citizens were not speaking up because GE "still has their pensions." Another interviewee believed that GE was spending lots of money and was trying to be responsible.

Homeowners and business owners with contaminated properties generally had negative opinions about GE. An affected business owner said GE purchased about five properties during the summer of 1997. The appraisal on his business was low. He believed he was being treated poorly by GE. His property had been fenced in by GE and he was losing business.

Another business owner discussed his feeling of discouragement. The business owner added that he believed that GE had fenced "half of Pittsfield's businesses and homes." GE sued him to gain access to 9 feet of his property along the river. The business owner said that his business was hurting and that each brownfields newspaper article created the impression that he was going out of business and, as a result, his customers went elsewhere.

One interviewee said people wondered why GE was willing to buy their properties. They were concerned that if GE bought the properties, the company would not have to meet the residential cleanup levels and restrictions.

Some interviewees stated their displeasure with GE. They talked about how representatives of the company had treated the residents of Pittsfield. The following comments present the negative attitudes of some interviewees:

- GE is getting away with murder. All the company does is put up fences and signs that say do not eat the fish, do not eat the turtles.
- GE got what it needed from Pittsfield – "we gave everything and now look… people are being cheated and taken advantage of."
- People do not trust bioremediation. GE is looking for the cheap way out.
- Three people said GE cannot be trusted.
- GE abandoned and badly served the town.
- GE is beating the regulatory agencies on getting its message to the public – agencies could write a letter to the newspaper editor each week to counter GE's editorials.

The following comments present the positive statements of some interviewees:

- The most recently discovered contaminated residential properties should be cleaned up by GE, which the interviewee understands the

company is willing to do. GE is spending lots of money and is trying more than ever.

- Interviewee credited GE with participating in a fair negotiation during the purchase of his house.
- GE is doing more than ever for the town, and the interviewee wonders if it is the beginning of a new era.
- EPA and GE seem to be working better together in the past few years.

3.7.2.4 Concerns for the Environment

Nine interviewees spoke about their concerns for the environment and the need to protect, preserve, and restore the surrounding area. One interviewee said that the river was a lost natural asset. The interviewee added that people were still eating contaminated fish, and sportsmen were still hunting and eating waterfowl and deer. Another interviewee said that the environmental agency posted warning signs, but children still wanted to go fishing and walking along the river, and teenagers wanted to gather along the riverbank.

One individual was concerned about the natural resource damage and viewed Superfund as a revenue source to continue protecting land and to help the county in a transition from a post-industrial community to a community focused on recreation and the natural environment. For example, resources could be used to purchase river frontage and old industrial properties and convert these areas to recreational uses.

One interviewee noted that lots of temporary solutions had occurred that people might think were permanent solutions. The interviewee added that people could misunderstand the temporary from the final solutions.

An interviewee asked what it would take to turn the area between Woods Pond and the first bridge "into a place of glory"? Another said that the river and lakes were for people, animals, and nature, not for industrial waste. The interviewee added that people appreciated the environment, and there was no need to pit jobs against the environment.

Another interviewee was not pleased with the amount of testing that had to take place and asked, "How many tests have to be done?" The interviewee added that the tests were all positive, "so start cleaning."

3.7.2.5 City of Pittsfield

Eight interviewees voiced concern about the local economy and the future of the City of Pittsfield. One person said the future of the city was

one of the top ten issues in the community and people were finally developing a sense that "things are happening" to address this issue. Another person said there were financial concerns about being able to bring new businesses to town. Along that same line, an interviewee said Pittsfield let GE manipulate the workforce and squelch other businesses from coming into the community.

One person said that the economic center of town had been destroyed and they could not revitalize it because of the pollution. The same person added that the empty buildings did not induce new businesses to locate to the area, and about a third of the population had moved elsewhere. Another person noted that "people once stayed in the community to work, buy a house, and raise a family; now the young folks are leaving the community."

Interview participants described their concerns for the City of Pittsfield. One stated that Pittsfield has experienced a downward economic spiral and an increase in crime. GE left the facility in a dreadful and unusable state. There was the impact of losing 8,500 jobs in 4 to 5 years. GE left town, which was, to some extent, due to the changing nature of the transformer business.

Another participant stated that there was a cloud hanging over Pittsfield. There was a lot of fear in the community. A number of people believed that the contaminated soil was not being fenced in or covered. This participant said, "people are reluctant to participate in the annual river cleanup – even in other branches of the river. The Housatonic River will always have a reputation for being an open sewer." There was a prime industrial property that could not be used – instead it was fenced off and developers were forced to go elsewhere in the community to develop. There was some fear that residential and industrial zoning would overlap and that jobs would become more important than the residential neighborhoods.

3.7.2.6 Residential and Commercial Contamination/Depressed Real Estate Values

Seven interviewees discussed their concern about the residential and commercial contamination. Interviewees stated specific personal concerns regarding contamination on residential and commercial properties. The comments regarding residential concerns focused on elderly people who did not want to move from their homes. The elderly had been living in their neighborhoods for a long time and wanted to continue to live there. One couple that still lived on contaminated property was frustrated about residences being fenced so that others could not move into the neighborhood. An interviewee said that residents need to be involved in the discussions about the residential cleanups. Another interviewee

voiced a concern that the number of people affected by contaminated fill would increase.

One man said he was concerned about the contaminated residences and that the residents' livelihoods and investments were threatened. He was concerned about the attitude this created, that people would say, "GE's been dumping here and even if I wanted to sell, I can't." On the other hand, one interviewee said the people who live in the neighborhood were the same people who had worked at GE and had done the dumping. Another interviewee said his concerns focused on the most recently discovered contaminated residential properties and that the homes should have been cleaned up by GE, which he understood the company was willing to do.

One resident said he had to move out of his first home, one that he and his wife had put a lot of work into making "a home." After PCBs were discovered in the basement of the house, the couple had to move. When the couple relocated, they remained in the neighborhood, but the husband said his second home was not as special as the first one. Another man said he was upset that he was using his retirement funds on lawyers' fees. A woman said she had to buy flood insurance because her home had been designated as being located in a floodplain. She said the insurance policy included specific restrictions on what she could do with her property. She added that it was ironic that the only flood occurred when the dam broke and carried the PCBs onto the floodplain properties.

Several businessmen explained their situation in owning contaminated property. One man said he was denied a loan for the roof of the building for his business; he could not sell the business; he could not build; he could not receive an abatement; and he was unable to use the property for collateral.

Another businessman said he was unable to expand his business because of the contamination – the banks would not give him a loan. He had been trying to negotiate with GE since the early 1990s. Because GE bought a few businesses on Newell Street, he thought GE could buy his business; however, GE was not interested. Then the statute of limitations ended. It took 7 months for him to receive an appraisal on his business versus the 2-week wait for residential properties. GE purchased about five properties during the summer of 1997. When his business was appraised, it was a low appraisal.

Another businessman said he had worked for 40 years to build his business, and now he had nothing because of the contamination. He had nothing to give to his son and grandson, and they did not want the business because of the contamination.

3.7.2.7 Superfund Designation

Fifteen interviewees stated when and how they had heard of the Superfund designation. The majority of interviewees learned of Superfund through the news media. Two interviewees expressed concern that they did not have enough information about the designation and its implications. Another interviewee mentioned that the community needed to better understand the meaning of Superfund.

Several interviewees mentioned past or current newspaper stories that referred to the Superfund designation. One interviewee had viewed stories about Superfund sites on national television. Another interviewee mentioned the media in general in reference to Superfund knowledge. Two had worked at or lived near other Superfund sites. Another was familiar with the Love Canal site. One individual learned of the Superfund designation in school and through environmental studies.

Eight interviewees had concerns about the site being listed as a Superfund site. The majority of these persons identified economic issues with regard to Superfund designation. The stigma of becoming a Superfund site and its negative effect on business was mentioned by several interviewees. Another person said that the community was still coming to terms with the problem and a formal designation would mean, "Oh, it is really, really bad."

Several persons expressed concern that GE and the government cooperate so that the company would continue its presence and efforts in the city. One person noted that there were still good jobs in Pittsfield and stated that EPA could be held accountable if those jobs left Pittsfield because of a Superfund designation. Another interviewee mentioned that there would be no momentum or progress on the projects that GE was willing to do for the city if the city became tied up in court with the company over a Superfund designation.

Several persons mentioned the Brownfields Development Plan as an alternative to Superfund designation. One interviewee said that a recent poll indicated support for brownfields development. Two other individuals mentioned the Larkin Brownfields proposal. This proposal, which was introduced by State Representative Peter Larkin, recommended designating only the Housatonic River as a Superfund site, with the GE portion of the site remaining under the RCRA permit for the cleanup and subsequent Brownfields redevelopment.

Eleven interviewees said they did not have concerns about the Superfund designation. Several interviewees said that Superfund would be a "hammer" to make GE negotiate or force GE to do the cleanup.

Several interviewees said Superfund listing would be beneficial because then actions would have to be taken to address the contamination. An interviewee said the Commonwealth was not involved enough to know what was going on and to force GE to take action. The same interviewee said that the Army Corps of Engineers should clean up the site. Another interviewee said the city had not been a real watchdog about pollution. Another interviewee said that listing the site would assist in testing all of the potentially contaminated areas.

Five of the "no concerns" responders noted that there could be a downside to listing the site under Superfund. One interviewee said that Superfund was seen as the best chance for a real cleanup, but it was a slow process. Another interviewee said a negotiated settlement would be preferable to EPA suing GE for damages. That interviewee added that it would be appropriate to proceed with the listing and that Superfund would mean more staff and resources dedicated to the site. An interviewee said Superfund would not be needed if the proposed brownfields plan were to succeed. That interviewee added that if the brownfields plan failed, the site should be listed and the move to Superfund should be made quickly if GE would not negotiate. Another interviewee said that Superfund was a frustrating process because it would require more testing. That interviewee added that Superfund listing would be welcomed if residents were told that their property would be cleaned up right away.

3.7.2.8 Government Relations with the Public

Two interviewees said they had favorable feelings about how the government had interacted with them concerning the contamination. Eight interviewees had negative feelings. Ten interviewees had mixed feelings about their interactions with the government. Generally, interviewees were concerned about communication with all three levels of government (federal, state, and local).

- **Government In General**

  An interviewee said cooperation among all three levels of government (federal, state, and city) was critical and that the governmental agencies were doing their best. Another interviewee said that to the government's credit, the agencies kept listening and opened channels of communication and held one-on-one meetings.

  One interviewee said that government efforts relieved panic and paranoia about PCBs.

  An interviewee said more emphasis should be placed on how government deals with the community. That interviewee added that

sharing the experiences of other communities, especially positive experiences, is important. The interviewee continued by saying, "Pittsfield is parochial and there is a prevalent perspective that the things that happen in Pittsfield or to Pittsfield only happen here." The interviewee added, "It's important to show that Pittsfield is not the only community with this problem. It is important for agency staff to connect with people, treat them with respect, and not patronize or speak too technically. If the staff don't connect with people, they won't be trusted." One interviewee pointed out that homeowners were told to call the government, instead of the government contacting the homeowners.

Another interviewee said it took too long for the agencies to complete reports. The interviewee wanted the information explained in plain English instead of in 100-page reports that were too technical.

- **Federal Government**

  One interviewee said that they believed EPA and MDEP were working together. That interviewee added that teamwork is encouraging because it was unusual for such an effort to last for 4 to 5 years. The interviewee added that the government staff members were available and the government had great resources. On the other hand, another interviewee said that federal and state governments and GE had made a boondoggle of the entire situation. That interviewee also stated that if things were so bad, why were residents still living in the middle of contamination a year later?

  One interviewee said that the federal and state governments were at fault because they were not applying pressure on GE. The interviewee said that GE was doing the RCRA activities exactly as they were told to do them.

  One interviewee had not had contact with the Commonwealth and EPA until 1995. The interviewee said the staffs were not doing their homework. The interviewee wanted to know when meetings were scheduled before they occurred. The interviewee was concerned that GE was doing the sampling, but there was not any EPA and MDEP sampling data to compare with the GE data.

  Another interviewee emphasized that EPA and MDEP should meet with the Pittsfield city council before meeting with the environmental community and public.

- **State Government**

  An interviewee said that MDEP had been somewhat helpful and that the government was needed to force GE to clean up the contamination.

  One interviewee said MDEP was good at the technical work, but not as good at developing relationships with people. The interviewee felt that there was a high turnover of staff and that residents had to keep pushing the agencies to do any testing.

  Another interviewee said there was no link between MDEP and the Pittsfield Health Department.

  An interviewee said that MDEP and GE were making decisions about their properties and that homeowners had no one to turn to. The interviewee asked what rights the people had if they were not satisfied with the MDEP/GE activities?

  One interviewee said that some residents did not call MDEP about their properties because they did not perceive that MDEP would take action.

  One interviewee did not like it when the MDEP and/or the GE environmental personnel showed up unexpectedly. The interviewee would appreciate advance notification of testing/sampling by letter so the interviewee would know who and when someone would visit their property.

- **Local Government**

  One interviewee said that the city was not responsive to this issue.

  An interviewee said that people were frustrated with the Pittsfield Health Department. They believed they were receiving the run-around. The interviewee added that people were not going to trust what was going on because they were not receiving information.

3.7.2.9 Most Effective Methods of Communication

The interviewees were asked what methods of communication were the most effective for providing information and explaining the issues. The interviewees answered in the following manner:

What methods of communication are most effective for you? for the community? (public meetings, workshops, press releases, fact sheets, neighborhood meetings, newsletters)

a)	Press releases (radio, television, newspapers)	10
b)	Public meetings	8
c)	Newsletters	6
d)	Toll-free telephone number/contact	4
e)	Fact sheets	2
f)	No response	2
g)	Workshops	1
h)	Neighborhood meetings	1
i)	Local radio programs	1

The interviewees commented on improving the dialogue between the government and the community by making these statements.

- It is important to have the regulatory agency staff make presentations to the public.
- Present straight facts, no political spin. Fact sheets about PCBs, capping, and sampling results information would be helpful.
- EPA/MDEP could develop a good mailing list, attend community meetings, and talk to the city council.
- The public needs the impacts, options, and risks explained. There is an issue about transporting and disposing of contaminated soil in a facility not located in Pittsfield versus a local facility. There is not enough participation from the other affected towns. Environmental groups could help with community outreach.
- Make the cleanup information user-friendly to people who are attending the meetings, keep the news lively, show concern about the hot spot cleanup, show concern and clean up people's backyards, and announce both the discovery of contamination and cleanup activities.
- Write the newsletters in layman's terms. A toll-free number should be maintained so that residents could save on their long-distance phone calls. Mail information that better explains what is being done and who to call with questions. The tests are too slow; speed things up.
- Personal contact and progress reports are important.
- Press releases are efficient but not entirely effective. It would be useful and informational to hold workshops with city councilors to educate them about the site. The community sees public meetings as target practice, and no one uses the information repositories.

- An explanation is needed about what Superfund means. A public meeting should be held every 3 months. At a minimum, the people should receive information on a monthly basis, especially for the people who do not attend the meetings. People are hearing from GE all the time and not from the government.
- Receiving information through the mail is not as useful as the public meetings. The information repositories are not really used.
- Press releases, although less informative, reach more people. Public hearings are not well attended, yet they are a good place to provide a lot of information.
- Hold public meetings outside of City Hall.
- Repetition and consistency are important.

3.8 CONCLUSION AND KEY ELEMENTS OF COMMUNITY INVOLVEMENT AT THE SITE

Community involvement objectives and activities have been developed to encourage public participation during upcoming activities at the site. The community involvement program is intended to ensure that residents and interested officials are informed about activities occurring at the GE facility and site and that they have an opportunity to provide input during the investigation and cleanup process.

The following subsections summarize information about various community relations objectives and activities for the GE/Housatonic River Site.

3.8.1 Provide the Community with Information about the Site

Residents along the river and local officials in Berkshire County and affected Connecticut communities along the river are receptive to receiving periodic updates on site activities and on the cleanup process. EPA and MDEP will continue to provide residents and officials with clear and understandable information about the ongoing activities and potential risks associated with the site. That information will be presented in the form of newsletters and fact sheets that reflect the community's need for updated information. The community also meets with regulators at public meetings and monthly CCC meetings.

3.8.2 Educate the Community about the Investigation and Cleanup Process

Focus group respondents stated that they are receptive to the role of EPA in resolving problems at the GE site. As information regarding investigations becomes available, EPA and MDEP will provide the public with the results of the investigations in a clear and understandable manner. As the cleanup process moves forward and new projects are developed, the community will be provided easy-to-understand information that reflects the goals and steps of the cleanup strategy.

3.8.3 Maintain a Communication Link with Residents and Officials

A Community Involvement Coordinator for the site has been designated by EPA as a contact person (see Attachment A.1, Key Contacts). Access to a contact person reduces the frustration that may accompany attempts to obtain information and communicate with the several agencies and organizations involved in the cleanup.

3.8.4 Evaluate the Effectiveness of the Community Involvement Program

As the cleanup process progresses, EPA and MDEP will evaluate the effectiveness of the community involvement activities in providing information to residents and encouraging citizen participation.

4.
COMMUNITY INVOLVEMENT TECHNIQUES

The community relations process is entered into to build citizen trust in the agencies and to guarantee meaningful local participation. Collaborative stakeholder processes that include affected citizens, organized citizen groups, elected officials, and potentially responsible parties (PRPs) give voice to the concerns and preferences for proposed and final remedies and for other significant decisions throughout the cleanup. To ensure a citizen's informed, educated role in the decision-making process, certain community involvement activities are required to be conducted at designated milestones during the investigation and cleanup process. This community relations plan is a formal strategy for conducting EPA community involvement activities.

Although the GE site has not been designated a Superfund site, EPA has determined that community involvement techniques will reflect the spirit of the Superfund law. Specifically, EPA will follow the statutory requirements for public involvement as detailed in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requirements for public involvement at Superfund removal sites and will also follow the statutory requirements for public involvement as detailed under the Resource Conservation and Recovery Act (RCRA). The CERCLA requirements will apply to all aspects of the cleanup except the Rest of River process which, up until the design stage, will follow public involvement requirements as detailed in RCRA. After any appeals of the selected remedy for the Rest of River have been exhausted, design and implementation of the Rest of River cleanup will be conducted under CERCLA. Attachment F.1 presents information about EPA's guidance for community relations activities at Superfund sites, and Attachment F.2 presents information about public participation activities at RCRA sites.

Activities that will be conducted during the investigation and cleanup of the GE/Housatonic River Site are described in the following subsections.

4.1 FORMATION OF A CITIZENS COORDINATING COUNCIL

As part of the Agreement in Principle, the negotiating parties asked the Massachusetts Office of Dispute Resolution (MODR) to convene a Citizens Coordinating Council. The council met for the first time on November 4, 1998, and meets monthly. The council meetings are open to the public. The council includes leaders from Berkshire County's political, environmental, community, and business sectors, as well as community and environmental representatives from affected northwest Connecticut communities. The council provides an important mechanism to ensure

that all of the parties honor their commitment to listen to, learn from, and incorporate the ideas and concerns of the community to the greatest extent possible. The council ensures that citizen concerns are incorporated into key environmental decisions made by all parties involved.

4.1.1 Purposes and Operating Guidelines for the Citizens Coordinating Council

The purposes of the Citizens Coordinating Council (CCC) are as follows:

1. To serve as a vehicle for community involvement in the implementation of the settlement agreement between GE and the government.

2. To be a mechanism to ensure that all parties to the negotiated agreement are able to honor their commitment to listen to, to learn from, and incorporate the ideas and concerns of the community to the greatest extent possible.

3. To enable representatives of diverse interests in the region to communicate with each other, and to provide community input and structured feedback to GE and the government.

To carry out these responsibilities and to enable the orderly and constructive conduct of meetings, the CCC uses the following operating guidelines:

1. Respecting the diverse interests and views of representatives.

2. Focusing the discussion on issues and substance, not individuals.

3. Raising hand for recognition to speak.

4. Requiring observers to convey ideas or questions to the group through one of the Council members.

5. Beginning and ending the meetings within the timeframe agreed upon for each meeting.

6. Regularly conveying information to and feedback from the constituency that members represent.

7. Providing continuity of representation by regular attendance.

8. Enabling involvement of interested citizens not on the Council via participation with subcommittees or task groups.

9. Contacting MODR and the CCC ahead of time if an alternate will be taking a member's place. Members may identify an alternate to attend in their place.

4.1.2 Council Membership

The CCC and the Connecticut Subcommittee of the CCC represent a wide variety of environmental, residential, community, and business interests in Berkshire County and western Connecticut. Council participants include representatives from local and state government; representatives from the federal and state agencies responsible for the project, as well as representatives from General Electric; representatives from numerous environmental, conservation, and outdoor recreational associations from throughout Berkshire County and western Connecticut; and representatives from the Berkshire County business community, including participants from the Berkshire Chamber of Commerce and Berkshire Community College. A list of local interest groups is included in Attachment A.8. For additional information regarding the membership of the Citizens Coordinating Council, contact the Massachusetts Office of Dispute Resolution (listed in Attachment A.3), which oversees the smooth operation of the Council.

4.1.3 Facilitating Council Meetings

The MODR facilitator will oversee the council meetings to ensure their smooth operation.

Basically, the role of the facilitator will be as follows:

- To prepare the meeting agenda.
- To ensure that all issues to be addressed during the meeting are included on the meeting agenda.
- To introduce speakers/presenters.
- To open the floor for discussion and ensure that the same members do not always dominate the discussion.
- To encourage quiet members to share their views.
- To sum up discussions and outline upcoming action items.

The facilitator plays an important role in running smooth meetings; however, each member also must recognize his/her role in the overall meeting atmosphere. The basic meeting structure is as follows:

- While lively debate is encouraged, members will refrain from interrupting other members during a discussion or presentation.
- Members will respect the decision of the facilitator to move a discussion along, or to end one, particularly if time is of the essence.
- If serious differences arise among members, the facilitator may ask that a separate meeting be held where differences can be settled.

4.1.4 Connecticut Subcommittee Mission Statement and Operating Guidelines

The mission of the Connecticut Subcommittee is as follows:

1. To serve as a platform for CT stakeholders in the implementation of the Consent Decree between General Electric and the Government.
2. To act as a Subcommittee to the GE-Housatonic River Citizens Coordinating Council (CCC), by linking its activities to those of the CCC including liaison with and reporting to the CCC.
3. To be a mechanism to ensure that all parties to the negotiated agreement are able to honor their commitment to listen to, to learn from, and incorporate the ideas and concerns of the community to the greatest extent possible.
4. To enable representatives of diverse interests in the region to communicate with each other, and to provide community input and structured feedback on the implementation of the Consent Decree cleanup activities.

To carry out its mission and to enable the orderly and constructive conduct of meetings, the CT Subcommittee will use the following operating guidelines:

1. Respecting the diverse interests and views of all people.
2. Focusing the discussion on issues and substance, not individuals.
3. Raising hand for recognition to speak.
4. Regularly conveying information to and feedback from other stakeholders not at the meetings.
5. Providing continuity by regular attendance.

6. Beginning and ending meetings within the agreed-upon timeframe. Meetings to begin at 7:00 p.m. and end at 9:00 p.m. unless otherwise agreed.

7. Holding meetings on a quarterly basis on the last Monday of the month. The first meeting was November 21, 2000.

8. Alternating the location of the meetings between New Milford and Kent. The first meeting was held in Kent.

9. Sending notices of meetings: Meeting notices will be sent in advance and as early as possible by the facilitator. Notices of meetings will also be posted on the EPA web site www.epa.gov/ne/ge/. Members will also assist this effort by communicating with the media and other stakeholders.

10. Preparing and distributing meeting highlights: The facilitator will prepare Committee meeting highlights. These notes will be distributed to all members as soon as possible after the meeting and reviewed at the start of the following meeting.

11. Receiving notification and notes from the GE-Housatonic River CCC meetings. All materials will be sent by electronic mail to those people who have provided email addresses.

12. Creating an Action Item list to assist the Committee in tracking commitments made during meetings. The facilitator will prepare this list.

13. Creating an Agenda: The CT Subcommittee will decide upon the agenda during their meetings. Committee members can also make suggestions for meetings by contacting the facilitator. The facilitator will use this input and create a proposed agenda. Each meeting's agenda will also include updates from EPA, the Natural Resource Damage (NRD) Trustee, and the CTDEP.

14. Participation and Representation: Meetings are public and open to all.

4.1.5 Summary of Citizens Coordinating Council Meetings

The following presents summaries of Citizens Coordinating Council meetings.

November 4, 1998—First meeting. Organization, mission, and operating procedures were discussed.

December 2, 1998—Discussed the purpose of the CCC and operating principles and guidelines. GE's Conceptual Work Plan for the Upper Reach of the Housatonic River (½-Mile) and GE's Source Control Work Plan for the Upper Reach of the Housatonic River (½-Mile) were discussed. Future meeting dates were set; and future agendas, topics, and priorities were discussed.

January 6, 1999—Distributed CCC purpose statement and operating guidelines. Presentation and discussion on Natural Resource Damage (NRD) issues by the NRD trustees. Also a discussion of future agenda items.

February 3, 1999—Presentation on Draft Removal Action Work Plan for Upper ½-Mile Reach of the Housatonic River followed by a question and answer period.

February 11, 1999—Further discussion of Draft Removal Action Work Plan for Upper ½-Mile Reach of the Housatonic River followed by a question and answer period.

March 3, 1999—Presentation on the Final Draft Supplemental Investigation Work Plan for the Lower Housatonic River including an overview of the work plan, the human health risk assessment, and the ecological risk assessment. Followed by a question and answer period.

April 7, 1999—Updates by the agencies and GE, presentation by EPA on the Final Draft Supplemental Investigation Work Plan for the Lower Housatonic River.

May 12, 1999—Presentation on the Interim Agreement Proposal for the implementation of work at the Allendale School and Upper ½-Mile Reach of the Housatonic River and on-site consolidation. Overview of the public comment process that the proposed interim agreement would be subject to. A question and answer period followed.

June 2, 1999—Review of possible future agenda items and discussion of landfilling as part of the Interim Agreement Proposal.

August 4, 1999—Updates on the progress of the Allendale School cleanup and preparation of the consolidation areas and work in the first ½ mile of the river. Followed by a presentation on the key provisions of the Economic Development Agreement reached between the City of Pittsfield and GE.

October 6, 1999—Updates on various cleanup activities followed by a discussion of residential fill concerns.

October 26, 1999—Presentation and overview on the Consent Decree settlement reached between the government parties and GE, an overview of the settlement, and an overview of the public comment process for the Consent Decree. A question and answer period followed.

November 17, 1999—Discussion about the residential fill program and how to adjust the process so that affected homeowners and residential fill organizations' involvement throughout the process is made more formal.

January 5, 2000—Presentation on the Natural Resource Damage (NRD) component of the settlement by the NRD trustees. Followed by updates on other aspects of the project and a question and answer period.

February 2, 2000—Updates by government agencies on the project and an update on the work of the Residential Fill Ad-Hoc Committee.

March 1, 2000—Presentation of the Engineering Evaluation/Cost Analysis (EE/CA) Report for the 1½-Mile Reach of the Housatonic River followed by a question and answer period.

April 12, 2000—Presentation of the agreement reached between EPA and Housatonic River Restoration, Inc. to address core community concerns regarding the cleanup as outlined in the Consent Decree reached between the government and GE. Followed by updates on other aspects of the project.

May 3, 2000—Updates on aspects of the project followed by a discussion regarding involving Connecticut stakeholders in future CCC meetings.

June 7, 2000—A CCC meeting is held in Stockbridge, MA, to facilitate participation of groups from Connecticut. EPA offers an update on "Rest of River" investigations, human health and ecological risk assessments, and hydrodynamic modeling. Connecticut DEP officials give updates on sediment and biota sampling efforts occurring in Connecticut. Natural Resource Damage updates and GE site remediation updates are also provided.

July 20, 2000—EPA, MDEP, and GE take the CCC members on a tour of the GE site in lieu of a monthly meeting. The site tour includes the following areas: Building 19, the Hill 78 and Building 71 On-Plant Consolidation Areas, and the ½-Mile Removal Action Area.

August 18, 2000—The CCC receives updates on EPA, MDEP, and GE activities and a presentation on the newly designed EPA web site for the GE project. This meeting was held at the Stockbridge Town Hall in order to accommodate interested citizens from the State of Connecticut. CCC members decide to not meet again until October.

October 4, 2000—Presentation to the CCC on the Consent Decree. Updates were presented by the agencies and GE.

November 21, 2000—GE - Pittsfield CCC Connecticut Subcommittee Meeting—The first organizational meeting of the GE - Pittsfield CCC Connecticut (CT) Subcommittee. Meeting discussion included the purpose behind the initial meeting, background on the CCC, the establishment of the CT Subcommittee, and a brief introduction to the cleanup issues and the Consent Decree. As a result of input from Connecticut representatives on the CCC, the CCC decided to explore the formation of a CT Subcommittee that would meet in Connecticut. The purpose of the subcommittee is to improve Connecticut stakeholders' ability to learn and comment on the cleanup of the Housatonic River and related areas covered by the Consent Decree. EPA, CTDEP, and the CT NRD trustee made presentations to the group and answered questions. The group also discussed the CT Subcommittee mission and procedures and decided that the subcommittee would meet on a quarterly basis.

January 5, 2001—GE-Housatonic River CCC Meeting—Updates by GE, MDEP, the NRD representative, and EPA. In addition, a presentation was made on the first meeting of the CT Subcommittee. As a result of the subcommittee meeting in Connecticut, the group reached a consensus that the name of the CCC should change to "GE-Housatonic River CCC" without the word "Pittsfield" in the name any longer.

February 7, 2001—GE-Housatonic River CCC Meeting—Updates presented by GE, MDEP, the NRD representative, and EPA. Updates included work in the river and the commercial properties and residential cleanup program. EPA announced a 2-week extension of the comment period for Connecticut residents to comment on the Biota Consumption Advisories on the River. There was a discussion whether the West Branch and entire watershed should be posted with consumption warnings. MDEP updated the group on activities at the King Street Dump, in the West Branch of the river, and sediment sampling in Goodrich Pond.

March 26, 2001—GE-Housatonic River CCC CT Subcommittee Meeting—EPA presentation on the preliminary evaluation of a wide spectrum of data gathered from the Rest of River Reach and a status report on the ecological characterization of the Connecticut Housatonic River Valley to map habitats, to identify animal use, and to develop baseline conditions that describe the ecological setting. A discussion about production and posting of fish consumption signs on the Connecticut portion of the Housatonic River ensued.

April 4, 2001—GE-Housatonic River CCC Meeting—EPA presentation to the group on the Human Health Risk Assessment Process with a discussion following. Updates on site activities by GE, EPA, MDEP, and

the NRD representative and an update on the March 26, 2001 Connecticut Subcommittee meeting.

May 2, 2001—GE-Housatonic River CCC Meeting—Updates by GE, EPA, and the NRD trustee. The first Peer Review Meeting (on the Modeling Framework document for Rest of River), held on April 25 and 26, 2001, was summarized and discussed.

June 6, 2001—GE-Housatonic River CCC Meeting—In lieu of a regular meeting, the CCC was given a tour of the GE site. Brief updates made by EPA and MDEP to the group, and a GE representative led the site visit, including a tour of work in the ½-Mile Reach of the river, the water treatment plant, and the Hill 78 Consolidation Area.

June 25, 2001—GE-Housatonic River CCC CT Subcommittee Meeting—The "Purpose Statement and Operating Guidelines of the CT Subcommittee" were reviewed by the group. EPA updated the group on the analysis of data collected from the Rest of River, including the review of more than 30 reports previously produced by federal and state agencies representing data from the past 30 plus years. A discussion followed the presentation. Updates were presented by CTDEP and the NRD representative.

July 24, 2001—GE-Housatonic River CCC Meeting—EPA presentation on the "Ecological Risk Assessment for the Housatonic River: Initial Field Study Results." The presentation included the role of the ecological risk assessment in the Rest of River project, EPA's approach, the role of field studies in the assessment, the initial results from the field studies, next steps, and a schedule. A discussion on the Ecological Risk Assessment followed. Updates were made by GE, EPA, MDEP, NRD, and CT Subcommittee.

Meeting minutes for recent CCC meetings are available on the EPA Housatonic River Web Site under the category "Public Events and Meetings." The EPA Housatonic River Web Site address is: http://www.epa.gov/ne/ge/.

4.2 ADMINISTRATIVE RECORD

The administrative record contains the information EPA considers or relies upon in selecting a response action. The administrative record file can be used to ensure that the public knows what is happening at the site as well as how to become involved in determining what happens at the site. EPA has established administrative records for the response actions selected at the site, and is establishing an administrative record for the Rest of River response action not yet selected. One set of administrative record documents on response actions selected to date is at EPA's Boston office (1 Congress Street, Suite 1100, Boston, MA 02114).

4.3 COMMUNITY INTERVIEWS

Using information obtained during the community interviews, EPA has developed this community relations plan that reflects consideration of the concerns and communication methods preferred by the community. (See Subsection 3.7 for community interview information).

4.4 INFORMATION REPOSITORIES

To provide the public with convenient access to information about the GE/Housatonic River Project, EPA has established several information repositories. The repositories contain current information, technical reports, work plans, fact sheets, and reference documents about the site. EPA has placed the information repositories at different locations along the Housatonic River.

To ensure the effectiveness of the repositories, in recent months, EPA has been reviewing the status of the existing repositories and consulting with members of the CCC and the CT Subcommittee of the CCC. In light of that review and those discussions, EPA has determined that, in the future, relevant information regarding the GE/Housatonic River Project will be made available at the following repository locations (the Connecticut locations will receive river-related information and overall project updates):

- EPA Records Center, Boston, MA.
- The Berkshire Athenaeum Public Library, 1 Wendell Avenue, Pittsfield, MA.
- Simon's Rock College of Bard Library, 84 Alford Road, Great Barrington, MA.
- Cornwall Public Library, 30 Pine Street, Cornwall, CT.
- Kent Memorial Library, 32 North Main Street, Kent, CT.
- Housatonic Valley Association offices, 150 Kent Road, Cornwall Bridge, CT.

EPA also has an extensive internet web site devoted to the GE/Housatonic River Project (http://www.epa.gov/ne/ge). On this web site, EPA places current and historical information relevant to the project.

In addition, copies of certain information related to the GE/Housatonic River Project are maintained in the following agency locations:

- Massachusetts Department of Environmental Protection, Springfield, MA.

- Connecticut Department of Environmental Protection, Hartford, CT.

Location information and hours of operation are presented in Attachment C.1.

4.5 PUBLIC COMMENT PERIODS

Public comment periods, which occur in conjunction with the release of the individual documents, provide all interested parties, including local officials, business leaders, residents, and community groups, an opportunity to express their opinions about the recommended cleanup alternatives and to participate in the final decision-making process for site cleanup. The comment periods are announced by an advertisement published in the *Berkshire Eagle.* A press release announcing the comment periods is also sent to other local media. The procedures as well as a contact name for obtaining further information may also be announced. Community input during the public comment periods is encouraged.

4.6 MAILING AND DISTRIBUTION LISTS

Mailing and distribution lists are maintained and updated throughout the project to ensure that the project's stakeholders are notified of meetings, are informed of project milestones, and receive important documents such as fact sheets and information about repository locations. A database of interested parties and their affiliations is developed to allow for efficient updating of the mailing list and to categorize stakeholders into subgroups for mailings.

4.7 PUBLIC MEETINGS

Public meetings will be held to describe environmental studies for different site areas and proposed or ongoing cleanup activities.

Public meetings provide opportunities for EPA and MDEP to address questions and comments, to discuss the recommended cleanup alternatives, and to obtain input from community members.

As described in Attachment I, Project Chronology, public meetings have been held at key project milestones to discuss environmental studies and cleanup activities. For example, public meetings have been held to discuss the Consent Order, residential fill issues, the RCRA Corrective Action Permit, the Agreement in Principle, Allendale School, the Consent Decree, and the Engineering Evaluation/Cost Analysis studies of the 1½-Mile Reach.

Availability sessions may also be held during the cleanup activities. The EPA Community Involvement Coordinator and the EPA Remedial Project Manager will conduct these meetings. The schedule of public meetings and availability sessions will remain flexible to account for milestones and public interest.

4.8 PUBLIC HEARING TRANSCRIPT

When a public hearing is held, a verbatim transcript will be prepared. EPA will place the transcripts in the information repositories.

4.9 MEETINGS WITH LOCAL OFFICIALS AND RESIDENTS

Various city and county officials and residents have indicated that they want to be kept informed about cleanup activities at the GE site. EPA and MDEP will continue to meet with these officials at various times throughout the cleanup process when requested by interested parties.

4.10 TECHNICAL ASSISTANCE GRANTS

Technical Assistance Grants (TAGs) are available for organizations or community groups to hire experts to assist them in understanding the technical information related to hazardous waste sites. TAGs are available from both EPA and MDEP.

Since May 1994, $90,000 from MDEP's Technical Assistance Grant and other accounts has been awarded to HRI. These funds have been used by HRI to fund technical outreach and education projects, including publishing newsletters and sponsoring educational forums, and working with local citizens to disseminate information about the cleanup process and risks associated with the sites. The technical assistance funding has also been used to hire a technical consultant to review reports, to attend technical meetings, to monitor the remediation process, and to provide and coordinate review comments on technical site-related reports. During a recent funding round, some of the money was used to train Pittsfield Fire Department personnel about the risks associated with PCBs at the GE/Pittsfield facility.

Additional information about TAGs is presented in Attachment E.

4.11 FACT SHEETS

During the course of the environmental studies at the GE/Housatonic River Site, various fact sheets and other informational materials have been produced and distributed to the public. Fact sheets and other publications produced by EPA, MDEP, and Massachusetts Department of Public Health are presented in Attachment H.

Additional fact sheets and publications, written in nontechnical language and produced to coincide with particular milestones during the investigation and cleanup process, will be developed to provide the community with detailed information about the site.

The fact sheets and newsletters will include applicable maps, repository information, project information, information related to public meetings and/or availability sessions, and contact persons. These fact sheets and newsletters will be placed in the information repositories and sent to all parties on the mailing list. Other fact sheets and publications may be developed to respond to specific community information needs.

4.12 PRESS RELEASES

Prepared statements will be released to local newspapers and to radio and television stations to announce significant findings at the site during the investigation/cleanup, and to notify the community of public meetings, public comment periods, or availability sessions.

Listings of local media outlets (newspapers, television stations, and radio stations) are presented in Attachments A.10, A.11, and A.12, respectively.

A listing of newspaper articles related to the GE/Housatonic River project (published in the *Berkshire Eagle* and the *Boston Globe*), and copies of selected newspaper articles are presented in Attachment D.

4.13 EPA WEB SITE

The GE/Housatonic River Web Site was developed by EPA to provide additional public access to information concerning the GE/Housatonic River site remediation. The web site is divided into the following areas:

- The Site
- Cleanup Agreement
- Restoration
- Redevelopment
- PCBs, Health and Environment
- Photo Gallery
- Site History and Description
- Links
- Press Releases
- Public Events and Meetings
- What's New

The web site address is http://www.epa.gov/ne/ge/. Exhibit 4-1 presents the home page of the GE/Housatonic River Web Site. The web site is currently receiving approximately 9,000 hits per month.

4.14 TELEPHONE HOTLINE

A toll-free telephone number, 888-372-7341, has been established and publicized in local newspapers and in publications, such as fact sheets and brochures, and announced at community meetings. The telephone number is available for members of the public to call and ask questions of EPA or to request copies of written information such as fact sheets, reports, or updates on activities at the site. Staff are also accessible via e-mail, and information requests and questions can be sent via the web site.

4.15 REVISED COMMUNITY RELATIONS PLAN

Through the various means of communication and interaction listed in this section, EPA will note changes in community concerns, information needs and activities, and revise this Community Relations Plan as necessary to respond to those changes. The revised Community Relations Plan will update and verify the information contained in this plan, assess the community involvement programs to date, and develop community involvement activities appropriate for the particular cleanup phase of the project.

4.16 PROGRAM EVALUATION

At key milestones during the investigation and cleanup, EPA will evaluate the effectiveness of the community involvement program for the GE/Housatonic River Site. Surveys, questionnaires, or other evaluation tools may be designed to assess the effectiveness of public meetings, fact sheets, and other activities in conveying information and encouraging citizen participation.

EPA United States Environmental Protection Agency New England

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PCBs, Health & Environment | Photo Gallery | Site History & Description

Introduction

Substantial progress has been made over the past year on the cleanup of the Housatonic River and Berkshire County. Much of the focus has been on removing PCB -contaminated river sediments and bank soils from the upper ½-mile reach of the Housatonic River in Pittsfield, MA. As of fall 2001, more than 10,700 cubic yards of contaminated river sediments and bank soils have been removed. The upper ½-mile cleanup is scheduled to be done by March 2002.

In November 2000, EPA's New England Office approved a final plan for cleaning up the next 1½ miles of the Housatonic River in Pittsfield between the Lyman Street Bridge and the confluence of the river's east and west branches. The cleanup, which will involve excavating about 95,000 cubic yards of PCB -contaminated sediments and bank soils, will begin after the first half -mile cleanup is done in early 2002.

The work comes after a federal judge in October 2000 gave final court approval to a 400 -page Consent Decree, which serves as a blueprint for the massive PCB cleanup in western Massachusetts and Connecticut. The judge's approval makes the cleanup plan legally binding. Among the projects covered in the Consent Decree are the cleanup of the Housatonic River, GE's 250 -acre property in Pittsfield, filled oxbow areas, Silver Lake, Unkamet Brook and floodplain properties along the river. The document also outlines a natural resource damage package that GE will fund. Additionally, GE has pledged $45 million for the cleanup and revitalization of the 250 -acre property in Pittsfield – among the largest Brownfields investments of its kind in the country.

Exhibit 4-1 GE/Housatonic River Web Site

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